Issuance Date: August 31, 2005
Effective Date: October 1, 2005
Expiration Date: October 1, 2010

AIR OPERATING PERMIT WAAOP-000062-1

In compliance with the provisions of The State of Washington
Clean Air Act Chapter 70.94 Revised Code of Washington

Kimberly-Clark Worldwide, Inc.
2600 Federal Ave.
Everett, Washington

is authorized to operate in accordance
with the terms and conditions
of this permit.

Issued by:

State of Washington
DEPARTMENT OF ECOLOGY
300 Desmond Drive
P. O. Box 47600
Olympia, Washington 98504-7600

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Introduction, Legal Authority, and Factual Basis

The Department of Ecology (Ecology) issues this Air Operating Permit (Permit) under strict authority conferred by the legislature in Chapter 70.94 RCW. The statute published the legislature's express intent that Ecology adopt programs and regulations to control air pollution. Ecology fulfilled that duty, publishing the Operating Permit Regulation, Chapter 173-401 WAC. The provisions of Chapter 173-401 WAC establish the elements of Washington state's Air Operating Permit program; those elements are coordinated and consistent with the requirements of Title V of the Federal Clean Air Act in 42 U.S.C. 7401, et seq. (Title V).

The requirements listed in this permit are federally enforceable, except those that are marked **State Only**. State Only requirements are marked in **bold print**.

Kimberly-Clark Worldwide, Inc. (KCWW) requires a Title V Air Operating Permit because it emits or has the potential to emit one hundred tons or more per year, of one or more regulated air pollutants [WAC 173-401-300(1)].

While drafting this permit, Ecology attempted to incorporate requirements using the exact language of the laws, regulations, or orders. In some cases, this was not possible. Where language differs, this difference is meant to clarify the underlying requirement. Consistent with the permit shield, compliance with the terms and conditions of this permit shall be deemed compliance with the applicable requirements identified in it. For permit conditions with multiple applicable requirements, we cite the most restrictive as the underlying requirement. The basis and listing of our selection is described in the UNDERLYING APPLICABLE REQUIREMENTS section of this permit. Note that although one set of monitoring and reporting requirements will address several specific applicable requirements, the emission source remains subject to all cited applicable requirements. Unless otherwise stated, the referenced regulation in effect on the date of permit issuance, applies.

The Title V Air Operating Permit consists of all parts of this assembled document including all Appendices, but does not include the accompanying Support Document. The Support Document explains the reason(s) or principle(s) behind each Condition or requirement in the Air Operating Permit.

The definitions of terms contained in WAC 173-401-200, and those defined in all other referenced regulations, apply to this permit –unless otherwise specifically defined in the permit.

Any federal "test method" referenced, unless specifically stated otherwise within the body of the permit, is contained in 40 CFR Part 60, Appendix A (July 1, 1992). Any state "test method" referenced, unless specifically stated otherwise within the body of the permit, is contained in the "Ecology Source Test Manual" published September 20, 2004. All state Orders are issued in accordance with the procedures in WAC 173-400-110 New Source Review.

Emission Unit Specific Requirements

The emission units covered by conditions A through J are subject to the following emission limits. These units are also subject to the facility-wide applicable requirements and the associated monitoring, recordkeeping, and reporting requirements. These limits are in the Facility-Wide section of this permit. Unless specified otherwise WAC 173-401-615 is the basis of authority for the required types and frequencies of monitoring imposed in conditions A through J.

Refer to Appendix D for emission estimate algorithms. These algorithms set forth the manner by which emissions are calculated where the Reference Method itself does not directly result in an emission estimate. The Permittee may use an equivalent alternative method with prior written approval from Ecology.

All reporting forms used for the monthly air emission report shall be approved by Ecology.

A. No. 14 Cogeneration Boiler

40 CFR Part 60 Subpart A, D and Db (except sulfur dioxide and nitrogen oxides requirements under Db), 40 CFR 60.8 (Performance tests), and 40 CFR 60.46 (Test methods and procedures) apply to the emission unit No. 14. The reference test methods and the specific requirements are listed below.

	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
1	NO_x[1]	180 lbs/hr and 150 ppmv @ 7% O_2 for a monthly average	The Permittee shall monitor using a continuous emission monitoring (CEM) method conforming to July 1, 1992, EPA Title 40 CFR Part 60, Appendix B and Appendix F Performance Specifications. Report monthly average (ppm), maximum daily (ppm), daily average (lbs/hr), monthly average (lbs/hour and tons/month), and any exceedance monthly. EPA Method 7E is the reference test method.	Order DE 98-AQI028 and 40 CFR 60.45 40 CFR 60.49b 40 CFR 60.13 40 CFR 60.46b 40 CFR 60.48b

	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
1	NO_x[1]	0.30 lb/million BTU derived from liquid fossil fuel, or liquid fossil fuel and wood residue, or gaseous fossil fuel and wood residue (184.8 lbs/hr)[2]	Compliance with the 180 lbs/hr NO_x limit satisfies the 184.8 lbs/hr limit.	40 CFR 60.44 40 CFR 60.44b(d)
2	CO[1]	359 lbs/hr and 511 ppmv @ 7% O_2 for a 365 day rolling avg. , and shall not exceed 763 ppmv @ 7% O_2 on a 30 day rolling average.	The Permittee shall monitor using the CEM method conforming to EPA Title 40 CFR (July 1, 1992) Part 60, Appendix B and Appendix F Performance Specifications. The Permittee shall report the daily average ppm, monthly average ppm, daily maximum ppm, daily average lbs/hr., and monthly average lbs/hr. Report any exceedance monthly. EPA Method 10 is the reference test method.	Order DE 98-AQI028 40 CFR 60.13
3	SO_2[1]	79.2 lbs/hr for a 12-month rolling average	The Permittee shall monitor using the CEM method conforming to EPA Title 40 CFR (July 1, 1992) Part 60, Appendix B and Appendix F Performance Specification. Report the 12 month rolling average and any exceedance monthly. EPA Methods 6 and 6C are the reference test methods.	[Order DE 98-AQI028 Condition 26] and 40 CFR 60.45 40 CFR 60.49b 40 CFT 60.13 40 CFR 60.45b(j) 40 CFR 60.47b(f)
3	SO_2[1]	0.80 lb/million BTU derived from liquid fossil fuel or liquid fossil fuel and wood residue (492.8 lbs/hr)[2]	Compliance with the 79.2 lbs/hr SO_2 limit satisfies the 492.8 lbs/hr limit.	40 CFR 60.43

	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
3	SO_2[1]	0.05 % sulfur, fuel oil	The Permittee shall maintain Fuel receipts	Order DE 98-AQI028 40 CFR 60.42(b)(j)
4	VOC	34.5 lbs/hr	The Permittee shall monitor and report yearly EPA Method 18 or EPA Method 25A test results	Order DE 98-AQI028
5	Particulate	0.011 gr/dscf @ 7% O_2 and 17.4 lbs/hr.	The Permittee shall test annually using EPA Method 5 and report test results annually. Testing reduced to annually by Ecology's written approval with 1-year continuous compliance established. If the limit is exceeded, the testing frequency shall return to quarterly until four tests are below 80 % of the limit. EPA Method 5 is the reference test method. Compliance with the 0.011 gr/dscf satisfies the 0.1 gr/dscf limit	Order DE 98-AQI028 40 CFR 60.49b
5	Particulate	0.1 gr/dscf @ 7% O_2	Compliance Assurance Monitoring (CAM): The Permittee shall evaluate and note the condition of the baghouse weekly. Repair any dysfunctional bags when detected and report bag failures within 72 hours. Failure to repair the system within 72 hours may be a violation of the permit and the underlying regulation.	[WAC 173-410-040(2)(c)(iii)]
5	Particulate	0.10 lb/million BTU derived from fossil fuel or fossil fuel and wood residue (61.6 lbs/hr)[2]	Compliance with the 17.4 lbs/hr PM limit satisfies the 61.6 lbs/hr limit.	40 CFR 60.42 40 CFR 60.43b
6	PM_{10}	0.0084 gr/dscf @ 7% O_2 and 11.6 lbs/hour	The Permittee shall monitor using EPA Method 201 or 201A (40 CFR Part 51, Appendix M), or Method 5 (assuming all PM is PM_{10}) and report annually. EPA Method 5 is the reference test method. Testing reduced to annually by Ecology's written approval with 1-year continuous compliance established. If the limit is exceeded, the testing frequency shall return to quarterly until four tests are below 80 % of the limit. Note CAM in A.5.	Order DE 98-AQI028

	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
7	Opacity[1, 3]	10% 6 consecutive minute average	The Permittee shall monitor using CEM method conforming to EPA Title 40 CFR (July 1, 1992) Part 60, Appendix B and Appendix F Performance Specification. The Permittee shall report daily average value, daily maximum value, and any exceedance monthly.	Order DE 98-AQI028 40 CFR 60.45 40 CFR 60.49b 40 CFR 60.11(c) 40 CFR 60.13
7	Opacity[1, 3]	20%, except for one 6-minute period per hour not greater than 27% opacity	The Permittee shall monitor using CEM method conforming to EPA Title 40 CFR (July 1, 1992) Part 60, Appendix B and Appendix F Performance Specification. The Permittee shall report daily average value, daily maximum value, and any exceedance monthly.	40 CFR 60.42(a)(2) 40 CFR 60.43b(f) 40 CFR 60.11(b) 40 CFR 60.46 (b)(3)
8	The Permittee shall comply with 40 CFR Part 63 Subpart DDDDD on or before September 13, 2007			40 CFR Part 63 Subpart DDDDD
9	Creosote treated wood	≤ 500 tons/day	The Permittee shall monitor and record the tons burned per day. The Permittee shall submit the daily amount on the monthly air report to Ecology	[Order DE 04AQIS-5956]

B. No. 10 Recovery Boiler

	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
1	NO_x[1]	See C.1 below	The Permittee shall monitor using CEM method conforming to EPA Title 40 CFR (July 1, 1992) Part 60, Appendix B Performance Specification. Report daily average (lbs/hr). The Permittee shall annually conduct a performance evaluation in accordance with Performance Specification 2 in (40 CFR Part 60 July 1, 1992) Appendix B.	Order DE 98-AQI028

2	SO_2[1]	300 ppm for an hourly average	The Permittee shall monitor using CEM method conforming to EPA Title 40 CFR (July 1, 1992) Part 60, Appendix B Performance Specification. The Permittee shall report daily average (ppm) and any exceedance monthly. The Permittee shall annually conduct a performance evaluation in accordance with Performance Specification 2 in Appendix B (40 CFR Part 60 July 1, 1992) Method 6C is the reference test method.	Order 1908 [WAC 173-410-40(1)(a)(e)]
3	Particulate	2.5 lb/ADUT 0.04 gr/dscf @ 8% O_2 0.06 gr/dscf @ 8% O_2	The Permittee shall annually conduct and submit DOE Method 5 (Reference test method). If one yearly test is greater then 0.04 gr/sdcf The testing frequency shall increase to quarterly until four quarterly test values are below 80% of the MACT II limit. This is a MACT II source for particulate and therefore, requires a continuous parameter monitoring system (CPMS).	WAC 173-410-40(2)(b) [40 CFR Part 63 Subpart MM] MACT II Order 1908
3	Particulate	Monitoring Plan	The Permittee must provide to Ecology a site-specific monitoring plan including a description of the control device, test results verifying the performance of the control device, the appropriate operating parameters that will be monitored, and the frequency of measuring and recording to establish continuous compliance with the standards. The monitoring plan is subject to Ecology's approval. The Permittee must install, calibrate, operate, and maintain the monitor(s) in accordance with the monitoring plan approved by Ecology. The Permittee must include in the information submitted to Ecology proposed performance specifications and quality assurance procedures for the monitors. The Permittee must monitor the parameters as approved by Ecology using the methods and procedures in the monitoring plan. The Permittee may establish expanded or replacement operating ranges for the monitoring parameter values listed in the approved monitoring plan. The CPMS monitoring plan shall be included in the Startup, Shutdown, and Malfunction Plan (SSMP). The CPMS monitoring plan is incorporated by reference into the Title V permit.	40 CFR 63.864(e)(14) WAC 173-400-075(5)

3	Particulate	Monitoring Plan	When the Permittee encounters conditions that do not meet the Operational Requirement defined in the SSMP, Permittee shall, within the shortest practical time but within four (4) hours, take Corrective Action or perform the applicable DOE test method except during startups or shutdowns while the system is stabilizing. The Permittee shall report all instances where the facility operates without meeting the Operational Requirement except during startups or shutdowns while the system is stabilizing, and Corrective Action taken, on the facility's monthly air emission report. Failure to take corrective actions is a violation of WAC 173-410-040(4) and may be a violation of the underlying requirement.	40 CFR 63.864(e)(14) WAC 173-400-075(5)
3	Particulate	Determination of operating range	During the initial performance test required in §63.865, the Permittee must establish operating ranges for the monitoring parameters in paragraphs (e)(14) of §63.864. The Permittee may base operating ranges on values recorded during previous performance tests or conduct additional performance tests for the specific purpose of establishing operating ranges, provided that test data used to establish the operating ranges are or have been obtained using the test methods required in this subpart. The Permittee must certify that all control techniques and processes have not been modified subsequent to the testing upon which the data used to establish the operating parameter ranges were obtained.	40 CFR 63.864(j)(2) WAC 173-400-075(5)
3	Particulate	On-going compliance	Following the compliance date, the Permittee must implement corrective action, as specified in the Startup, Shutdown, and Malfunction Plan prepared under §63.866(a) if the operating parameters approved by Ecology as established are outside the range of parameter. For purposes of determining the number of non-opacity monitoring exceedances, no more than one exceedance will be attributed in any given 24-hour period. Following the compliance date, the Permittee is in violation of the standards of §63.862 if the monitoring exceeds values in section (2) for six or more 3-hour average values within any 6-month reporting period.	40 CFR 63.864(k) 40 CFR 63.864(k)(vi) 40 CFR 63.864(k)(2-3) WAC 173-400-075(5)

3	Particulate	Monitoring Methods	For purposes of determining the concentration or mass of PM emitted, Permittee must use Method 5 in Appendix A of 40 CFR part 60. The sampling time and sample volume for each run must be at least 60 minutes and 0.90 dscm (31.8 dscf), and Permittee must use water as the cleanup solvent -instead of acetone- in the sample recovery procedure. The PM concentration must be corrected to the appropriate oxygen concentration using Equation 7 in 40 CFR 63.865(B)(2). Permittee must use Method 3A or 3B in Appendix A of 40 CFR part 60 to determine the oxygen concentration. The gas sample must be taken at the same time and at the same traverse points as the particulate sample. For purposes of selecting sampling port location and number of traverse points, Permittee must use Method 1 or 1A in Appendix A of 40 CFR part 60. For purposes of determining stack gas velocity and volumetric flow rate, Permittee must use Method 2, 2A, 2C, 2D, 2F, or 2G in Appendix A of 40 CFR part 60. For purposes of conducting gas analysis, Permittee must use Method 3, 3A, or 3B in Appendix A of 40 CFR part 60. For purposes of determining moisture content of stack gas, Permittee must use Method 4 in Appendix A of 40 CFR part 60.	[40 CFR 63.865(b)(1-3, and 5)] WAC 173-400-075(5)

3	Particulate	Record keeping	a) The Permittee must develop and implement a written plan as described in §63.6(e)(3) that contains specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and control systems used to comply with the standards. In addition to the information required in §63.6(e), the plan must include the requirements in paragraphs (1) and (2) of this section. (1) Procedures for responding to any process parameter level that is inconsistent with the level(s) established under §63.864(j), including the procedures in paragraphs (1)(i) and (ii) of this section: (i) Procedures to determine and record the cause of an operating parameter exceedance and the time the exceedance began and ended; and (ii) Corrective actions to be taken in the event of an operating parameter exceedance, including procedures for recording the actions taken to correct the exceedance. (2) The startup, shutdown, and malfunction plan also must include the schedules listed in paragraphs (2)(i) and (ii) of this section: (i) A maintenance schedule for each control technique that is consistent with, but not limited to, the manufacturer's instructions and recommendations for routine and long-term maintenance; and (ii) An inspection schedule for each continuous monitoring system required under §63.864 to ensure, at least once in each 24-hour period, that each continuous monitoring system is properly functioning. b) The Permittee must maintain records of any occurrence when corrective action is required and when a violation is noted in "Determination of operating range" above.	[40 CFR 63.866(a), and (b)(3-5)] WAC 173-400-075(5)

3	Particulate	Record keeping	c) Records of parameter monitoring data required under §63.864, including any period when the operating parameter levels were inconsistent with the levels established during the initial performance test, with a brief explanation of the cause of the deviation, the time the deviation occurred, the time corrective action was initiated and completed, and the corrective action taken. d) Records and documentation of supporting calculations for compliance determinations made under §§63.865(b). e) Records of monitoring parameter ranges established for the recovery furnace process unit.	[40 CFR 63.866(a), and (b)(3-5)] WAC 173-400-075(5)
3	Particulate	Excess emissions	The Permittee must report monthly on the air emission report if measured parameters meet any of the conditions specified in paragraph (k)(2) of §63.864. This report must contain the information specified in §63.10(c) of this part as well as the number and duration of occurrences when the source met or exceeded the conditions in §63.864(k)(2). Reporting excess emissions below the violation thresholds of §63.864(k) does not constitute a violation of the applicable standard. (1) When no exceedances of parameters have occurred, the owner or operator must submit a monthly report stating that no excess emissions occurred during the reporting period. (2) The owner or operator of an affected source or process unit subject to the requirements of this subpart and subpart S of this part may combine excess emissions and/or summary reports for the mill.	40 CFR 63.867(c) WAC 173-400-075(5)

4	Opacity[1,3]	35% for 6 consecutive minutes	The Permittee shall monitor using CEM method conforming to EPA Title 40 CFR (July 1, 1992) Part 60, Appendix B Performance Specification. The Permittee shall report daily average and any exceedance monthly. The Permittee shall conduct a performance evaluation of Performance Specification 1 in Appendix B (40 CFR Part 60 July 1, 1992). EPA Method 9 is the reference test method. The opacity limit only applies when the No. 10 boiler is in operation.	Order 1908
5	NH_3	<10 ppm @ 7 % O_2	The Permittee shall perform an annual source test with Method 5 in appendix A of 40 CFR part 60 with impringer modification or an equivalent method approved by Ecology	Order DE 98-AQI028
6	Operational capacity	7,928,000 gal/month of SSL burned.	Operational records. The Permittee shall report SSL (gallons/month) burned and any exceedance monthly.	Order DE 98-AQI028
B.7. is a **State only** requirement and is not federally enforceable under the Clean Air Act.				
7	TRS[1]	17.5 ppm (1 hour average)	The Permittee shall measure TRS emissions annually using test method conforming to EPA 40 CFR Part 60, Appendix A, Method 16A/6C. Upon replacement of the existing sulfur dioxide measuring CEM on this boiler, the new CEM shall be capable of measuring both sulfur dioxide and total reduced sulfur, in accordance with a CEM method conforming to EPA Title 40 CFR (July 1, 1992) Part 60, Appendix B Performance Specification 5 and using quality assurance procedures outlined in 40 CFR Part 60, Appendix F. Once the dual parameter CEM is installed the averaging period for TRS will be daily, the sampling frequency will be continuous, and the Permittee shall report the monitoring results to Ecology on each monthly emission report form.	WAC 173-410-040(5)

C. #14 and #10 Boilers combined

	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements

1	NO_x[1]	1400 tons rolling yearly total of both boilers	The Permittee shall monitor using CEM method conforming to EPA Title 40 CFR (July 1, 1992) Part 60, Appendix B Performance Specification. The Permittee shall report yearly rolling total tons and any exceedance monthly. The Permittee shall annually conduct a performance evaluation in accordance with Performance Specification 2 in Appendix B (40 CFR part 60 July 1, 1992)	Order DE 98-AQI028

D. Power Boilers Nos. 7, 8[3] and 9[3] in aggregate

	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
1	Natural gas use	413,300,000 ft^3/ month maximum; 80,000,000 ft^3/ month (12- month rolling average.)	Operational records. The Permittee shall report ft^3/month used and any exceedance monthly.	Order DE 98-AQI028
2	fuel oil use	469,000 gal/month maximum; 39,100 gal/month (12-month rolling average)	Operational records. The Permittee shall report gallons/month used and any exceedance monthly.	Order DE 98-AQI028
3	Sulfur	0.05 % sulfur, fuel oil	The Permittee shall maintain fuel receipts	Order DE 98-AQI028

E. Catalytic Oxidizer (EM5)

	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
1	Particulate	50 lb/day	The Permittee shall track gas usage monthly and calculate particulate using EPA emission factor AP42 1.4 and report particulate emission calculations monthly.	Order DE 79-335

2	Hydrocarbon	100 lb/day	The Permittee shall conduct an annual source test using applicable EPA method for non-methane hydrocarbons or equivalent approved by Ecology and report hydrocarbon emissions annually.	Order DE 79-335

F. Gas Burners (EM4)

	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
		None	No further monitoring or reporting required.	Order 01AQIS-3575

G. Gas Burners (EM3)

	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
		None	No further monitoring or reporting required.	Order 1522-AQ04

H. Chlorine Dioxide Generator

	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
1	Chlorinated HAPs Not including chloroform	10 ppmv as Cl_2	The Permittee shall measure as chlorine per 40 CFR 63.457(b) annually and report the results to Ecology.	40 CFR 63-445(c)(2)
2	Chlorine dioxide	0.019 lbs/hour	The Permittee shall measure chlorine dioxide from the chlorine dioxide generator stack per 40 CFR 63.457(b) yearly and report the results to Ecology.	Order No. DE 99AQIS-2
3	Carbon monoxide	25.8 lbs/hour	The Permittee shall measure carbon monoxide from the chlorine dioxide generator stack by EPA Method 10 or 10A of 40 CFR Part 60, Appendix A yearly and report the results to Ecology.	Order No. DE 99AQIS-2
4	For any visible emission from the Bleach Plant stack other than condensed water, the Permittee shall investigate and correct the problem within one (1) hour. The Permittee shall read and log any visible emission other than condensed water using 40 CFR Part 60, Appendix A, Method 22 during the visible episode. If any readings were logged, they shall be reported in the monthly report.			Order No 1908
5	The chlorine dioxide scrubber is a MACT I source and therefore, requires a continuous parameter monitoring			40 CFR 63.453

	system (CPMS). The Permittee shall prepare a monitoring plan to monitor the pH and flow rates of the scrubber solution and include the values of the CPMS parameters that show continuous compliance with the MACT I limit for chlorinated HAPs being emitted from the chlorine dioxide generator. The permittee must submit any revisions to the plan to Ecology for approval prior to implementing the revisions. The Permittee shall record monthly the pH and flow rates of the scrubber solution and the time that the booster fan is introducing gases into the chlorine dioxide generator scrubber (determined by fan amps readings greater than zero). The Permittee's CPMS monitoring plan is incorporated by reference into the Title V permit.	40 CFR 63.453(m)

I. Mill emission (All emissions from mill except emissions from the power boiler)

	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
1.	Sulfur dioxide	20 lbs/ADUT	The Permittee shall calculate the daily average mill emission. The daily averages shall be recorded and submitted on the monthly air emission report. Emissions from the recovery boiler stack shall be the only emission point used in this calculation except leaks. The production shall be the monthly average for that month. The pounds of sulfur dioxide shall be a daily average. EPA Methods 2, 2A, 2C, or 2D of 40 CFR Part 60 Appendix A shall be used to determine the flow rate; and, EPA Method 4 of 40 CFR Part 60 Appendix A used to determine the moisture content.	[WAC 173-410-040(1)(a)] Order 1908 Attachment A

J. General MACT Requirements

J.1 General and SSMP Requirements

	Parameter	Limit (shall not exceed)	Monitoring and reporting	Applicable Requirement(s)
i	Operation	-	The Permittee shall operate and maintain the emission unit subject to the MACT standard and its associated air pollution control equipment in a manner consistent with good air pollution control practices. For purposes of this requirement "good" means minimizing emissions at least to the levels required by all relevant standards. During periods of startup, shutdown, and/or malfunctions, KCWW shall	[40 CFR Part 63, §63.6(e)(1)(i)] WAC 173-400-075(5) [40 CFR Part 63,

			operate and maintain the source (including associated air pollution control equipment) in accordance with the procedures specified in the latest SSMP plan. The Permittee shall correct malfunctions as soon as practicable after their occurrence in accordance with the latest SSMP plan.	§63.6(e)(3)(ii) and (iii)] WAC 173-400-075(5) [40 CFR Part 63, §63.6(e)(1)(ii)] WAC 173-400-075(5)
ii	SSMP	-	The Permittee shall prepare and implement a Startup, Shutdown, and Malfunction Plan (SSMP) for each emission unit subject to a MACT standard by the compliance date for each applicable MACT source. The Permittee shall prepare the SSMP in accordance with 40 CFR 63.6(e). The Permittee shall keep a copy of the SSMP at the mill site and shall update the plan as needed. When the SSMP is updated, KCWW shall retain copies of the previous versions of the SSMP for periods of 5 years. The Permittee's SSMP plan is incorporated by reference into the Title V permit.	[40 CFR Part 63, §63.6(e)(3)(i) and (v)] WAC 173-400-075(5) 40 CFR 63.6(e)(3)(i) WAC 173-400-075(5)
iii	Record keeping	-	The Permittee shall maintain records of all information required by this section of the permit in a form suitable and readily available for expeditious inspection and review. The records shall, at a minimum, contain the information described in 40 CFR § 63.10(b) (2). Records shall be retained for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, or report. If Permittee deviates from the SSMP plan during a startup, shutdown, or malfunction events, KCWW shall record the actions taken for that event. Permittee shall report such actions within two (2) working days after commencing actions inconsistent with the plan and shall follow up with a letter within seven (7) working days describing the event. The report shall contain the name, title, and signature of a responsible official who is certifying its accuracy, explaining the circumstances of the inconsistencies, the reasons for not following the SSMP, and whether	[40 CFR Part 63, §63.10(b)(1)] WAC 173-400-075(5) [40 CFR Part 63, §63.6(e)(3)(iv) and §63.10(d)(5)(ii)] WAC 173-400-075(5)

			any excess emissions and/or parameter monitoring exceedances occurred.	
iv	Reporting requirements	-	The Permittee shall submit the SSMP plan reports only if such an event results in an excess emission during the reporting month. The Permittee shall deliver or postmark the report by the 15th day following the end of each reporting month.	[40 CFR Part 63, §63.10(d)(5)(i)] WAC 173-400-075(5)
v.	MACT Standards		The Permittee shall comply with applicable requirements prescribed in 40 CFR Part 63, Subpart A, and Sections §63.6, §63.7, §63.8, §63.9, and §63.10.	40 CFR 63, §63.440(g) WAC 173-400-075(5)

J.2.A. Controls

	Parameter	**Limit** (shall not exceed)	**Monitoring and reporting**	**Applicable Requirement(s)**
i	Methanol	Emit no more than 1.1 kilograms of total HAP or methanol per megagram (2.2 pounds per ton) of ODP.	The Permittee shall perform EPA Method 308 on the recovery boiler stack emissions as defined in Appendix A to 40 CFR 63 Subpart S. The Permittee shall use EPA Method 1 to determine the sampling site. The Permittee shall use EPA Method 2 of 40 CFR Part 60 Appendix A to determine the flow rate and EPA Method 4 of 40 CFR Part 60 appendix A to determine the moisture content. The compliance test was performed with three individual runs of 60 minutes minimum on May 1, 2001. If the Permittee changes the amount of methanol routed to the recovery boiler stack, the Permittee shall complete another methanol compliance test and report the results on the monthly air report.	40 CFR 63.444(c)(1) 40 CFR §63.444(c)(2)(i) WAC 173-400-075(5)
ii	Sulfur dioxide annual leak test	No instrument reading greater than 5 ppm_v SO_2 above background	The Permittee shall perform an annual leak test for sulfur dioxide on the positive pressure portion of the closed vent system using an Industrial Scientific Corporation Model ATX 612 instrument or an EPA approved equivalent. An instrument reading greater than 5 ppm_v SO_2 above background by the above instrument defines a leak. This alternative method was approved by EPA in their letter dated May 7, 2004. If a leak greater than 5 ppm_v SO_2 above background is detected, the Permittee shall	40 CFR 63.453(k)(3) WAC 173-400-075(5)

			repair each leak as specified in the current SSMP.	

J.2.B. Inspection Requirements

	Parameter	Limit (shall not exceed)	Monitoring & Reporting	Applicable Requirements
i.	Inspection	-	The Permittee shall perform a visual inspection of the closure mechanism of each enclosure opening at least once every 30 days to ensure the opening is maintained in the closed position and sealed.	40 CFR Part 63.453(k)(1) WAC 173-400-075(5)
ii.	Inspection	-	The visual inspection shall include the ductwork, piping, enclosures, and connections to covers for visible evidence of defects. The Permittee shall perform this inspection every 30 days or as requested by the Department.	40 CFR 63.453(k)(2) WAC 173-400-075(5)
iii.	Inspection	-	The Permittee shall demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in 40 CFR Part 63, §63.457(e).	40 CFR Part 63.453(k)(4) WAC 173-400-075(5)

J.2.C. Recordkeeping Requirements

	Parameter	Condition and /or Limit	Monitoring and Reporting	Applicable Requirement(s)
i	Record keeping	-	The Permittee shall comply with the recordkeeping requirements in 40 CFR Part 63 Subpart A, Section §63.10 and 40 CFR Part 63, §63.454(b) listed in J.2.C.(ii) below.	40 CFR 63.454 WAC 173-400-075(5)
ii	Inspection	-	For each applicable enclosure opening, closed vent system, and closed collection system, the Permittee shall prepare and maintain a site-specific inspection plan, in accordance with 40 CFR Part 63, §63.454(b), including a drawing or schematic of the components of applicable	40 CFR 63.454 WAC 173-400-075(5)

ii	Inspection		affected equipment and shall record the following information for each inspection: a. Date of inspection; b. The equipment type and identification; c. Results of negative pressure tests for enclosures; d. Results of leak detection tests; e. The nature of the defect or leak and the method of detection; f. The date the defect or leak was detected and the date of each attempt to repair the defect or leak; g. Repair methods applied in each attempt to repair the defect or leak; h. The reason for the delay if the defect or leak is not repaired within 15 days; i. The expected date of successful repair of the defect or leak if the repair is not completed within 15 days; j. The date of successful repair of the defect or leak;	40 CFR 63.454 WAC 173-400-075(5)

J.2.D. Reporting Requirements

		Condition and / or limit	Monitoring and reporting	Applicable requirements
I	Reporting	-	The Permittee shall comply with the reporting requirements in 40 CFR Part 63, Subpart A, and all of the requirements in 40 CFR 63.455.	40 CFR 63.455 WAC 173-400-075(5)

[1] CMS Data Recovery. State and federal regulations recognize that monitoring data may be lost for legitimate reasons. The Permittee may be exempted from monitoring and reporting requirements during periods of monitoring system malfunctions, provided that the Permittee shows that the malfunction was unavoidable and is being repaired as expeditiously as practicable. [40 CFR §60.13(e**);** 40 CFR 63.8(c)(4); WAC 173-400-105(5)(h); WAC 173-410-067. The Permittee shall make every effort to acquire, maintain, and recover valid monitoring data. CMS downtime and resulting monitoring data loss due to malfunctions shall be less than 10% of the monthly unit operating time. An acceptable explanation for the loss of monitoring data must be provided in the monthly report. Periods when CMS data is not recovered due to daily calibration, zero and span checks are not considered nor reported as CMS downtime in the monthly report. Records of daily calibrations, zero and span checks shall be kept for a period of five years and made available upon request to Ecology. [WAC 173-401-615(1)(c); WAC 173-401-630(1)]

[2] For comparison purposes, this value was calculated based on oil firing, assuming a heat-input rate of 616 million BTU's/hr.

[3]The Permittee is authorized to perform a flame test on these boilers once each year provided that the Permittee notifies Ecology 30 days before the test is to be conducted.

Facility-Wide General Requirements

These general requirements apply facility-wide, including to insignificant emission units or activities. Insignificant emission units or activities, however, are not subject to monitoring, testing, recordkeeping, reporting, or compliance certification requirements.

1. Varying Emission Rate. The Permittee cannot vary the rate of emission of a pollutant according to atmospheric conditions or ambient concentrations of that pollutant, except as directed according to air pollution episode regulations. [WAC 173-400-205]

2. Detrimental Emissions. The Permittee shall not cause or permit emission of any contaminant if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business. [WAC 173-400-040(5)]

3. Concealment and Masking. The Permittee shall not install or use any means that conceal or mask an emission of an air contaminant that would otherwise violate provisions in this permit. [WAC 173-400-040(7)]

4. Fugitive Emissions. The Permittee shall take reasonable precautions to prevent the release of air contaminants from emission units engaged in material handling, construction, demolition, or any other operation that is a source of fugitive emissions. Reasonable precautions include but are not limited to application of water to paved areas and debris piles as necessary to control fugitive dust or the timely removal or coverage of material piles. [WAC 173-400-040(3)(a)]

5. Fugitive Dust. The Permittee shall take reasonable precautions to prevent fugitive dust from becoming airborne and maintain and operate the source to minimize emissions. Reasonable precautions include but are not limited to application of water to paved areas and debris piles as necessary to control fugitive dust or the timely removal or coverage of material piles. [WAC 173-400-040(8)(a)]

6. Particulate Matter Deposition. **The following condition is state-only and is not federally enforceable under the Clean Air Act:** No deposit of particulate matter beyond the property line, so as to interfere unreasonably with use and enjoyment. [WAC 173-400-040(2)]

7. Odors. **The following condition is state-only and is not federally enforceable under the Clean Air Act:** Any person causing odor which may unreasonably interfere with use and enjoyment of property must use recognized good practice and procedures to reduce odors to a reasonable minimum. [WAC 173-400-040(4)]

8 Opacity. The Permittee may not cause or allow the emission of a plume from any emission unit other than a recovery furnace which has an average opacity greater than 20% for more than 3 consecutive minutes in any 60 minute period except as provided in WAC 173-400-040)(1)(a). [WAC 173-400-040(1)]

9. Complaints. Except where specific requirements are defined elsewhere, the Permittee shall assure compliance with conditions 1 through 7 by recordkeeping of actions taken by the Permittee in response to complaints received by the Permittee or of possible noncompliance noticed by the facility staff in day to day operations. The Permittee shall assess the validity of each complaint and commence corrective action, if warranted, as soon as possible but no later than 3 working days of receiving the complaint. The Permittee shall keep records of the following: complaints received; the assessment of validity; and what, if any, corrective action was taken in response to the complaint. [WAC 173-401-630]

10. Sulfur Dioxide Emissions. Emissions from any unit, other than a recovery system, a blow system or acid plant, shall not exceed 1000 ppm of sulfur dioxide, corrected to seven- percent oxygen in the case of combustion unit, for an hourly average. [WAC 173-410-040(1)(f)]

11. Comply with Applicable Requirements.

    A. The Permittee will continue to comply with applicable requirements with which the Permittee is in compliance. [WAC 173-401-630(3) and WAC 173-401-510(2)(h)(iii)(A)]

    B. The Permittee will meet applicable requirements that become effective during the permit term on a timely basis. [WAC 173-401-510(2)(h)(iii)(B) and WAC 173-401-630(3)]

12. Good Air Pollution Control Practice. The Permittee shall at all times, including periods of abnormal operation and upset conditions, to the extent practicable, maintain and operate any affected facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practice. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to Ecology which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [WAC 173-410-040(4)]

13. Chemical Accidental Release Program. This stationary source, as defined in 40 CFR Part 68.3, may be subject to part 68, the accidental release prevention regulations. If required this stationary source shall submit a risk management plan (RMP) by the date specified in section 68.10. If required this stationary source shall certify compliance with the requirements of part 68 as part of the annual compliance certification per 40 CFR part 70 or 71.

14. Stratospheric Ozone Protection

A. The Permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditions (MVACs) in Subpart B:
   i. Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to § 82.156.
   ii. Equipment used during the maintenance, service, repair or disposal must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
   iii. Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technical certification program pursuant to § 82.161.
   iv. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to § 82.166 ("MVAC-like appliance" is defined at § 82.152.)
   v. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
   vi. Owners/operators of appliances normally containing 50 or more pounds or refrigerant purchased and added to such appliances pursuant to § 82.166."

B Permittee may switch from any ozone-depleting substance to any alternative approved pursuant to the Significant New Alternatives Program (SNAP), 40 CFR Part 82, Subpart G, without a permit revision but shall not switch to a substitute listed as unacceptable pursuant to such program. [40 CFR 82.174]

C Any certified technician employed by Permittee shall keep a copy of their certification at their place of employment. [40 CFR 82.166(1)]

D The Permittee shall not willfully release any regulated refrigerant and shall use refrigerant extraction equipment to recover regulated refrigerant that would otherwise be released into the atmosphere. [RCW 7070.94.970(2), 970(4)] **State Only**

E Compliance with this term and condition will be demonstrated by using a certified contractor or employee. [40 CFR Section 82 and **RCW 70.94.970 (the RCW is a state-only requirement)**]

15. Insignificant Emission Units. The generally applicable requirements that apply to IEUs are: WAC 173-400-040, WAC 173-400-050(1) & (3), WAC 173-400-060.

16. Volatile Organic Liquid Storage Vessels. The Permittee shall keep records showing the dimensions and capacities of all storage vessels having capacities greater than or equal to 40 cubic meters that are used to store volatile organic liquids and for which construction, reconstruction, or modification commenced after July 23, 1984. These records are to be kept for the life of each storage vessel. [40 CFR 60.116b (a) and (b)]

17. Used Oil Burning. The following condition is **state-only** and is not federally enforceable under the Clean Air Act. The Permittee can burn used oil only if it

meets the standards prescribed in RCW 70.94.610. Emission units regulated by this AOP qualify as "facilities permitted by the department" in RCW 70.94.610(2). Reprocessed fuel oil (RFO) burned in such regulated emission units is not subject to the requirements of RCW 70.94.610(1). [RCW 70.94.610]

18. Asbestos. The Permittee shall comply with the applicable requirements of 40 CFR Part 61, subpart M (asbestos NESHAP) and WAC 173-400-075 when conducting any renovation or demolition at the facility. [WAC 173-400-075]

19. Reserved.

20. Reserved.

21. Unit-Specific Requirements. The Permittee shall conduct routine monitoring of emissions in accordance with the program of monitoring or testing required by specific emission unit conditions of this permit. [WAC 173-410-062].

22. Unavoidable Excess Emissions. This condition applies where Permittee claims excess emissions are unavoidable, pursuant to WAC 173-400-107, and Permittee wishes to be excused from Ecology's imposition of enforcement action or penalty. The Permittee may include in its reports any demonstrations that excess emissions were unavoidable, consistent with the requirements of WAC 173-400-107. The Permittee shall have the burden to prove that deviations from permit terms were unavoidable. Excess emissions that are unavoidable are excused and are not subject to penalty. [WAC 173-400-107]

23. Violation Duration. A violation of an emission limit is presumed to commence at the time of the testing, recordkeeping or monitoring indicating noncompliance, and to continue until the time of retesting, recordkeeping or monitoring that indicates compliance. This presumption may be defeated if credible evidence shows that the violation was of longer duration, that there were intervening days during which no violation occurred or that the violation was not continuing in nature. [42 U.S.C. 7413(e)(2)]. The Permittee may conduct monitoring or testing more frequently than required by this permit.

24. Insignificant Emission Units. The Permittee is not subject to any testing, monitoring, reporting, or recordkeeping for the insignificant emission units or activities listed. [WAC 173-401-530(2)(c)]

25. Reserved.

Recordkeeping Requirements

26. Monitoring Records. The Permittee shall keep records of any periodic and continuous monitoring required by this permit. These records shall include the following, where applicable:
    a. The date, place as defined in requirement, and time of sampling or measurement;
    b. The date(s) analysis was performed;
    c. The company or entity that performed the analysis;
    d. The analytical techniques or methods used;
    e. The results of such analysis; and
    f. The operating conditions existing at the time of sampling or measurement.
    [WAC 173-401-615(2)(a) and WAC 173-400-105]

27. Inspection Checklists. Where the Permittee is required to use and maintain an inspection checklist, the checklist must contain, at a minimum, the following information:
    a. The person conducting the inspection;
    b. The date/time of the inspection;
    c. Location of the inspection;
    d. The observations made during the inspection;
    e. Corrective actions taken if any; and
    f. The date and time corrective action was initiated and completed.
    [WAC 173-401-615(1)(b)]

28. Changes at Source. The Permittee shall keep records describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. [WAC 173-401-724(5)]

29. Records Retention. The Permittee shall retain records of all required monitoring data and support information for a period of 5 years from the date of monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all data from continuous monitoring instrumentation, and copies of all reports required by this permit.
    [WAC 173-401-615(2)(c)]

30. Recording Permit Deviations. The Permittee shall maintain a contemporaneous record of any deviation from the requirements of this permit.
    [WAC 173-401-615(3)(b)]

31. Reserved.

Reporting Requirements

32. Unit Reporting Requirements. In addition to any emission unit specific reporting requirements identified below, the Permittee shall comply with any emission unit specific reporting requirements identified in special specific emission unit conditions of this permit.

33. Production Reporting. Report within 15 days of the end of each month average daily production of air-dried unbleached pulp. [WAC 173-410-062(2)]

34. Monthly Reports. Monitoring reports required by this permit must be submitted to Ecology within 15 days following the end of each reporting calendar month. [WAC 173-410-062(2)] The reports must clearly identify all instances of deviations from permit requirements. [WAC 173-401-615(3)(a)]

35. Emission Inventory. The Permittee shall submit an inventory of emissions, as specified in WAC 173-410-071, from the source each year no later than 105 days after the end of the calendar year. The Permittee shall maintain records of information necessary to substantiate any reported emissions. [WAC 173-410-071 and WAC 173-400-105(1)]

36. Permit Deviations/Excess Emissions. The Permittee shall promptly submit a report of any deviations from permit conditions.

    a. For purposes of this permit, submitting a report "promptly" means the following: (1) if the deviation presents a potential threat to human health or safety, the report shall be made as soon as possible but no later than 12 hours after the discovery of the deviation; (2) for other deviations, "promptly" means that the deviations are identified in the respective monthly report.

    b. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. The Permittee may include in its reports demonstrations that excess emissions were unavoidable, consistent with the requirements of WAC 173-400-107. [WAC 173-401-615(3)(b) and WAC 173-400-107]

37. Certifications. Any application form, report, or compliance certification submitted pursuant to Chapter 173-401 WAC shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under Chapter 173-401 WAC shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [WAC 173-401-520]

38. Report Address. The Permittee shall submit all reports, renewal applications, and compliance certifications to:

    Department of Ecology
    Industrial Section

P.O. Box 47706
Olympia, WA 98504-7600

Permittee shall also submit compliance certification to:

Environmental Protection Agency
Air Operating Permits, Region 10
1200 Sixth Avenue, OAQ-108
Seattle, WA 98101-1128

39. Compliance Requirements/Certification.

a. The Permittee shall continue to comply with applicable requirements with which the Permittee is in compliance;

b. The Permittee shall meet applicable requirements that will become effective during the permit period on a timely basis;

c. The Permittee shall submit, annually by January 31, a report certifying compliance with the terms and conditions contained in this permit to the Department of Ecology and to Region 10 of EPA. The certification shall describe the following:
   i. the permit term or condition that is the basis of the certification;
   ii. the compliance status;
   iii. whether compliance was continuous or intermittent; and
   iv. the methods used for determining compliance, currently and over the reporting period consistent with required monitoring

d. The Permittee is not required to certify compliance for insignificant emission units or activities. [WAC 173-401-530(2)(d), WAC 173-401-510(2)(h)(iii), and WAC 173-401-630 (5)]

40. Reserved.

Standard Terms and Conditions

41. Duty to Comply. The Permittee must comply with all conditions of this chapter 401 permit. Any permit noncompliance constitutes a violation of chapter 70.94 RCW and, for federally enforceable provisions, a violation of the Federal Clean Air Act (FCAA). Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [WAC 173-401-620(2)(a)]

42. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [WAC 173-401-620(2)(b)]

43. Permit Actions. This permit may be modified, revoked, reopened, and reissued or terminated for cause. The filing of a request by the Permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [WAC 173-401-620(2)(c)]

44. Property Rights. This permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d)]

45. Duty to Provide Information. The Permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the EPA administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205. [WAC 173-401-620(2)(e)]

46. Permit Fees. The Permittee shall pay fees as a condition of this permit in accordance with Ecology's fee schedule. Failure to pay fees in a timely fashion shall subject the Permittee to civil and criminal penalties as prescribed in Chapter 70.94 RCW. [WAC 173-401-620(2)(f)]

47. Emissions Trading. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes already provided for in this permit. [WAC 173-401-620(2)(g)]

48. Severability Clause. If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and shall be enforceable. [WAC 173-401-620(2)(h)]

49. Permit Appeals. The Permittee may appeal this permit or any conditions in it only by filing an appeal with the pollution control hearings board and serving it on the permitting authority within thirty days of receipt pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA. [WAC 173-401-620(2)(i)]

50. Permit Continuation. This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued --or denied-- if the Permittee submitted a timely and complete application. [WAC 173-401-620(2)(j)]

51. Application and Issuance of a Renewal Permit. The Permittee shall submit a complete permit renewal application to Ecology no later than six months, but no earlier than 18 months, prior to the expiration date of the existing permit. Permits being renewed are subject to the same procedural requirements, including those for public participation, and for affected state and EPA review, that apply to the initial permit. [WAC 173-401-710(1) & (2)]

52. Inspection and Entry. The Permittee shall allow the permitting authority or an authorized representative to perform the following upon presentation of credentials and other documents as may be required by law:

a. Enter upon the Permittee's premises where a chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

d. As authorized by WAC 173-400-105 and the FCAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [WAC 173-401-630(2)]

53. Federally Enforceable Requirements. All terms and conditions of this permit, including any provisions designed to limit potential to emit, are enforceable by EPA and citizens under the FCAA, unless they are specifically designated as not federally enforceable. [WAC 173-401-625]

54. Reopening for Cause. This permit shall be reopened and revised under any of the following circumstances:

a. Additional requirements become applicable when the remaining permit term is greater than three years. Such reopening shall be completed not later than 18 months after promulgation of the applicable additional requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j).

b. Additional requirements (including excess emissions requirements) become applicable under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated in the permit.

c. Ecology determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or

d. Ecology determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

Procedures to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. [WAC 173-401-730]

55. Tampering and False Statements. No person shall make any false material statement, representation or certification in any form, notice or report required in this permit. No person shall render inaccurate any monitoring device or method required under this permit. [WAC 173-400-105(7) and (8); and 40 CFR 70.11(a)]

56. Providing Additional Data. For Ecology to evaluate a plant's emissions or emission control program, the Permittee shall furnish other data requested by Ecology. [WAC 173-410-062(3)]

Permit Shield

Pursuant to WAC 173-401-640(1), compliance with the terms and conditions of this permit shall be deemed compliance with the applicable requirements identified in this permit, as of the date of permit issuance. This permit shield does not exempt the Permittee from requirements determined to be applicable and enacted after the permit issuance date. This permit shield shall not apply to any insignificant emission unit or activity designated under WAC 173-401-530. [WAC 173-401-530(3)]

Pursuant to WAC 173-401-640(2), the Department of Ecology has determined that the requirements listed in Appendix A below do not apply to the facility, as of the date of permit issuance, for the reasons specified.

APPENDIX A: PERMIT SHIELD/INAPPLICABLE REQUIREMENTS

All inapplicable requirements have not been included in the table below. The requirements that are obviously inapplicable to the pulp mill have been deleted from the table below. The following requirements do not apply to the facility:

CITATION	BRIEF DESCRIPTION	REASON
40 CFR §60.43(a)(2) subpart D	1.2 lb SO_2/million Btu derived from solid fossil fuel or solid fossil fuel and wood residue	K-C burns no solid fossil fuel.
40 CFR §60.43(b) subpart D	utilize formula to determine SO_2 standard when different fossil fuels are burned simultaneously	K-C boilers burn no combinations of fossil fuels. Emission limits set in permit approval do not have different values for different fuels.
40 CFR §60.44(a)(1) subpart D	0.20 lb NOx /million Btu derived from gaseous fossil fuel	The cogeneration boiler is the only source large enough to be considered in this NSPS category. Natural gas will serve only as a startup and auxiliary fuel.
40 CFR §60.44(a)(3) subpart D	0.70 lb NOx /million Btu derived from solid fossil fuel or solid fossil fuel and wood residue (except lignite or solid fuel w/ 25% coal refuse)	K-C burns no solid fossil fuel.
40 CFR §60.44(a)(4) & (5) subpart D	0.60 lb NOx /million Btu derived from lignite or lignite and wood residue; but 0.80 lb/million for lignite from ND, SD, or MT and burned in a cyclone-fired unit	K-C burn no lignite fuel.
40 CFR §60.44(b) subpart D	utilize formula to determine NOx standard when different fossil fuels are burned simultaneously	K-C boilers do not burn combinations of fossil fuels.
40 CFR 60, Subpart Da	NSPS for Electric Utility Steam Generating Units for Which Construction Commenced after September 18, 1978.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart.
40 CFR Part 60 Subpart Dc	applies to steam generating units for which construction, modification or reconstruction commenced after June 9, 1989, and that has a maximum design heat input capacity of < 100 million Btu/hour, but > 10 million Btu/hour	Sources subject to 40 CFR 60 Subpart D are not subject to this subpart. Thus, the Cogeneration No. 14 boiler is not covered here because Subpart D applies to it. Also, K-C has no other boilers which fit this capacity criteria.

CITATION	BRIEF DESCRIPTION	REASON
40 CFR Part 60 Subpart Db. All of Section 60.42b except for subsection 60.42b(j). All of Section 60.44b except for subsection 60.44b(d). All of Section 60.45b except for subsection 60.45b(j). All of Section 60.47b except for subsection 60.47b(f)	Applies to steam generating units for which construction, modification or reconstruction commenced after June 19, 1984, and that has a heat input capacity from fuels combusted in the unit of > 100 million Btu/hour.	The preamble to the proposed rule states that "steam-generating units firing very low sulfur fuel oil are exempt from the SO_2 percent reduction requirement limiting SO_2 emissions from industrial-commercial-institutional steam generating units." 54 Federal Register 28448 July 6, 1989. The No. 14 boiler does not combust coal, nor does it combust mixtures of oil, gas, and waste wood simultaneously. Facilities that combust low-sulfur oil are not subject to the requirements of these sections.
40 CFR 60, Subpart E	NSPS for Incinerators	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart.
40 CFR 60, Subpart BB	Applies to facilities in kraft pulp mills	K-C in Everett is a sulfite-based pulp and paper mill. This NSPS covers Kraft processes only; no part of it applies to a sulfite mill.
40 CFR 61, Subpart E	Stationary sources which process mercury ore to recover mercury, use mercury chlor-alkali cells to produce chlorine gas and alkali metal hydroxide, and incinerate or dry wastewater treatment plant sludge.	K-C operates no applicable equipment. K-C incinerates sludge from its primary and secondary wastewater treatment plants with its woodwaste. However, this boiler is defined statutorily as a woodwaste boiler, not a sludge incinerator. Sludge is an incidental and minor fuel. The mercury emission standards (40 CFR 61.52) specifically apply to mercury ore processing facilities, mercury cell chlor-alkali plants, sludge incineration plants, and sludge drying plants, not to woodwaste boilers. In chemical analyses, mercury has not been detected in K-C's sludge in any case. A nondetectable level of mercury in the sludge would show potential emissions well below 3,200 grams/day and well below the 1,600 grams/day repeat testing threshold defined in the rule.

CITATION	BRIEF DESCRIPTION	REASON
40 CFR 60, Subpart Ka	NSPS for Storage Vessels for Petroleum Liquids for which construction, reconstruction, or modification commenced after May 18, 1978 and prior to July 23, 1984.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart.
40 CFR 60, Subpart O	NSPS for Sewage Treatment Plants.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart.
40 CFR 60, Subpart BB	NSPS for Kraft Pulp Mills.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart. This pulp mill does not use the "Kraft" Technology.
40 CFR 60, Subpart GG	NSPS for Stationary Gas Turbines	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart.
40 CFR 60, Subpart CCCC	NSPS for Commercial and Industrial Solid Waste Incineration Units for which construction is commenced after November 30, 1999 or for which modification or reconstruction is commenced on or after June 1, 2001	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart.
40 CFR 60, Subpart DDDD	Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units that commenced construction on or before November 30, 1999	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart.
40 CFR 63, Subpart H	NESHAPS for Source Categories – Equipment Leaks	This Facility is subject to the provisions of Subpart S, the specific NESHAPS for Pulp and Paper sources. Subpart S has requirements for Closed Vent Systems and does not reference Subpart H.
40 CFR 63, Subpart Q	NESHAPS for Source Categories – Industrial Process Cooling Towers	Facility does not use Chromium-based cooling tower water treatment chemicals.

CITATION	BRIEF DESCRIPTION	REASON
40 CFR 63, Subpart DD	NESHAPS for Source Categories – Off-Site Waste and Recovery Operations.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart. This Facility is not a TSDF operation.
40 CFR 63, Subpart KK	NESHAPS for Source Categories – Printing and Publishing Industry.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart.
40 CFR 63, Subpart OO	NESHAPS for Source Categories – Tanks – Level 1.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart. The storage tank subject to 40 CFR Part 60, Subpart Kb is not required to have emission control equipment under that Subpart and Subpart OO is not referenced.
40 CFR 63, Subpart PP	NESHAPS for Source Categories – Containers.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart. Subpart S does not reference this Subpart.
40 CFR 63, Subpart QQ	NESHAPS for Source Categories – Surface Impoundments.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart. Subpart S does not reference this Subpart.
40 CFR 63, Subpart RR	NESHAPS for Source Categories – Individual Drain Systems.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart. Subpart S does not reference this Subpart.
40 CFR 63, Subpart TT	NESHAPS for Source Categories – Equipment Leaks-Control Level 1.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart. Subpart S does not reference this Subpart.
40 CFR 63, Subpart UU	NESHAPS for Source Categories – Equipment Leaks-Control Level 2 Standards.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart. Subpart S does not reference this Subpart.
40 CFR 63, Subpart VV	NESHAPS for Source Categories – Oil-Water Separators and Organic-Water Separators.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart. Subpart S does not reference this Subpart.

CITATION	BRIEF DESCRIPTION	REASON
40 CFR 63, Subpart WW	NESHAPS for Source Categories – Storage Vessels (Tanks)-Control Level 2.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart. The storage tank subject to 40 CFR Part 60, Subpart Kb is not required to have emission control equipment under that Subpart and Subpart WW is not referenced.
40 CFR 63, Subpart YY	NESHAPS for Source Categories – Generic Maximum Achievable Control Technology Standards.	This facility does not operate any sources that are listed as affected sources under the applicability provisions of this Subpart.
40 CFR 63, Subpart EEE	NESHAPS for Source Categories – Hazardous Waste Combustors.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart.
40 CFR 63, Subpart EEEE	NESHAPS for Source Categories – Organic Liquids Distribution (Non-Gasoline).	Concentrated spent sulfite liquor does not meet the subpart's definition of an "Organic Liquid."
40 CFR 63, Subpart FFFF	NESHAPS for Source Categories – Miscellaneous Organic Chemical Manufacturing.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart.
40 CFR 63, Subpart JJJJ	NESHAPS for Source Categories – Paper and other web coating.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart.
40 CFR 63, Subpart UUUU	NESHAPS for Source Categories – Cellulose products manufacturing.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart.
40 CFR 63, Subpart YYYY	NESHAPS for Source Categories – Stationary combustion turbines.	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart.
40 CFR 63, Subpart ZZZZ	NESHAPS for Source Categories – Stationary reciprocating internal combustion engines.	Facility has RICE units which are exempt due to use only as emergency generators and as emergency fire protection pumps.
40 CFR 71	Federal Operating Permit Programs	Since the State of Washington administers a State Operating Permit Program consistent with Federal Requirements, this regulation is not applicable to this facility.
40 CFR 72	Acid Rain Program	Facility is not an affected source under this regulation.
40 CFR 73	Sulfur Dioxide Allowance System	Facility is not an affected source under this regulation.

CITATION	BRIEF DESCRIPTION	REASON
40 CFR 74	Sulfur Dioxide Opt-Ins	Facility is not an affected source under this regulation.
40 CFR 76	Acid Rain Nitrogen Oxides Emission Reduction Program	Facility is not an affected source under this regulation.
40 CFR 82 except for Subpart F and Subpart B	Any person who may sell or distribute, or offer to sell or distribute, in interstate commerce any of the listed nonessential Class I or Class II chlorofluorocarbons. 40 CFR §82.64.	This is not a part of K-C 's business.
40 CFR 85	Control of Air Pollution from Mobile Sources	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Subpart.
[WAC 173-400-040(6)]	Any person, except where can demonstrate no feasible method of meeting the limit. SO_2 1,000 ppm (corrected to 7% O_2), average of 60 consecutive minutes.	Standards identified in Chapter 173-410 WAC supersede this requirement.
[WAC 173-400-040(8)(b)]	Fugitive dust sources identified as significant contributors to local PM-10 [standard] non-attainment. Reasonably available control technology to control emissions.	K-C is not in a non-attainment area and has therefore not been identified as a significant contributor to a PM-10 non-attainment problem.
[WAC 173-400-101] Registration	Power boilers; Kraft pulp mills; any major source. Register source with Ecology or local authority; With approval of WA operating permit program, these requirements don't apply to operating permit sources.	The Air Operating Permit program of Chapter 173-401 WAC will supersede the annual registration (WEDS) program currently followed. Additional regulations covering the registration program (WAC 173-400-102, -103, & 104) likewise do not apply.
[WAC 173-400-105(5)(a)]	Continuous monitoring & recording required for opacity and SO2 of fossil fuel fired steam generators, except where capacity < 250 million BTU/hr heat input.	The capacity of applicable K-C boilers fit the exception.

CITATION	BRIEF DESCRIPTION	REASON
[WAC 173-400-105(6)]	Sources not subject to operating permit program. Submit sufficient info to determine impact on ambient concentrations of SO_2 of changes in raw materials or fuels increasing emissions of $SO_2 \geq 40$ tpy.	Only applies to sources not subject to operating permit program.
[WAC 173-400-151]	Sources to which significant visibility impairment of a Class 1 area is reasonably attributable. Apply best available retrofit technology (BART) for contaminant contributing to impairment that is emitted at > 250 tpy.	K-C has not been identified as a source impacting a Class I area.
[Chapter 173-490 WAC]	Standards for Volatile Organic Compounds	Facility does not have or operate equipment, processes or operations that would be subject to these provisions. The facility does not operate equipment in any of the listed source categories.
[Chapter 173-491 WAC]	Standards for Gasoline Vapors	Facility does not store or dispense gasoline.
[Chapter 173-434 WAC]	Solid Waste Incinerator Facilities	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this Section
[Chapter 173-425 WAC]	Outdoor Burning	Outdoor burning is not allowed on facility site.
[Chapter 173-406 WAC]	Acid Rain Regulation	Facility does not have or operate equipment, processes or operations that meet the applicability definitions for this section.
[Chapter 173-405 WAC]	Kraft mills, which are defined as any manufacturing facility which uses an alkaline solution containing sodium hydroxide and/or sodium sulfide.	This rule is for Kraft pulping only, and does not apply to the K-C, Everett sulfite pulp mill.
[WAC 173-410-040(1)(b)]	Sulfite pulping mill that does not incinerate spent sulfur liquor restricted to 4 lbs SO_2 /ton of air dried, unbleached pulp (daily avg.).	K-C burns its spent liquor in Recovery Boiler No. 10

CITATION	BRIEF DESCRIPTION	REASON
[WAC 173-410-040(1)(c)]	Blow system restricted to 0.2 lb SO_2/ton of air dried, unbleached pulp discharged from digester (15 min. avg.)	Digester system and washer emissions are integrated into the spent liquor burning and acid recovery plant. No digester blow emissions are released directly to atmosphere. Emissions are collected for recovery.
[WAC 173-410-040(2)(a)]	Recovery systems constructed before 1/24/72 restricted to 0.10 grains/dscf.	Applicability date is not consistent with the facility's recovery system.
[WAC 173-410-040 (2)(c)(ii)]	Units which combust fuel other than wood & wood residue to produce steam & which began construction after 1/1/83.	Power boilers 7, 8, and 9 are grandfathered as their installation dates precede the applicability criteria
[Chapter 173-433 WAC]	Any device that burns wood, coal, or any other non gaseous or non liquid fuels. WAC 173-433-020 & -030(9).	This regulation applies to wood stoves and fireplaces. K-C does not operate such devices.
[WAC 173-435-050(2)]	no open fires during an air pollution episode	No open burning is done at the K-C Everett mill site.
[RCW 70.94.610]	Cannot burn used oil not meeting standards prescribed in RCW 70.94.610(1).	K-C utilizes a contractor to ship used oil off-site for reclamation.

Appendix B. Existing Applicable Orders

Order 1908 – Amended Order

Order DE 98-AQI028 - #14 Boiler Amended Order

Order DE 04AQIS-5956 – Creosote Order

Order DE 99AQIS-2 – Bleach Plant Scrubber Amended Order

Order DE 1522 AQ04 – TM3

Order DE 02AQIS-3575 – TM4 Amended Order

Order DE 79-335 – TM5 Amended Order

August 31, 2005

CERTIFIED MAIL
7000 0520 0022 0743 6208

Scott T. Helker, Mill manager
Kimberly Clark Worldwide, Inc.
2600 Federal Avenue
Everett, WA 98201

Dear Mr. Helker:

Enclosed is Order No. 1908-AQ05, consolidating requirements for controlling recovery furnace emissions. It includes the mill's emissions limits and the applicable maximum achievable control technology (MACT II) standards.

If you have any questions concerning the content of this document, please call or write Don Nelson, P.E. His telephone number is (360) 407-407-6940; his mailing address is:

Department of Ecology
Industrial Section
P.O. Box 47706
Olympia, WA 98504-7600.

Chapter 43.21 RCW confers a right to appeal this Order. Chapter 371-08 WAC and the Order/Permit Appeal Provision of WAC 173-400-250, explain procedures for filing an Appeal of this Order to the Pollution Control Hearings Board. Further details about the Appeal process are described in the Order.

Sincerely,

Carol Kraege, P.E.
Industrial Section Manager

Enclosure
c: Christine Kurtz, KCWW, Inc.

DEPARTMENT OF ECOLOGY

IN THE MATTER OF	)	AMENDED
AN ADMINSTRATIVE ORDER	)	ADMINISTRATIVE
TO: KIMBERLY CLARK WORLDWIDE, INC.	)	ORDER No. 1908-AQ05

To: Scott T. Helker, Mill Manager
Kimberly Clark Worldwide, Inc.
2600 Federal Avenue
Everett, WA 98201

This Order rescinds all of previous Orders DE 78-106 and DE 01AQIS-3298, and it amends Orders DE 98-AQI028, DE 99AQIS-2, and DE 02AQIS-3575. Itemized changes, with their justifications, follow below:

1. Order DE 78-106 is hereby rescinded.

Order DE 78-106 was issued February 27, 1978, to implement the requirements of Chapter 173-410 WAC on the Everett mill. The mill's configuration has changed to the point that many of the requirements of the 1978 Order either no longer apply or they are superseded by the MACT I and II requirements. Specifically:

- The 1978 Order contained conditions for the "Mill 1 unit" that was never built.
- The particulate monitoring frequency for Boiler Number 10 has been changed from monthly to annually. The permittee's ten years of monthly data show compliance with the MACT II particulate standard. The testing frequency will increase to quarterly if one test is greater than 0.04 gr/sdcf, until four quarterly test results are below the 0.032 gr/sdcf (80% of the MACT II limit) level. The operations of the de-mister system will serve as a surrogate for particulate.
- Continuous monitoring of sulfur dioxide, from the acid plant and blow system, is no longer required. The Permittee must conduct an annual sulfur dioxide leak test on all positive pressure parts of the closed vent system in the pulping area. This is a MACT I requirement. Leaks are defined as any sulfur dioxide concentration greater than 5 ppm_v above background. MACT I also requires the Permittee to inspect this area every thirty days. In its Title V application, the Permittee certified that the acid plant and the blow system have no designed emissions points, only infrequent leaks. There are no emission outlets to the outside air for sulfur dioxide from either the acid plant or the digesters. The Number 10 boiler is the only sulfur dioxide emission point from the pulp mill.
- The method of calculating the concentration of sulfur dioxide emissions was inconsistent with the methodology required by MACT. The continuous emission monitoring system sulfur dioxide data will be used to calculate the pounds of sulfur dioxide per oven-dried ton of pulp.
- The required reporting schedule was a form defined by the order, which cannot be changed without amending the order. To improve flexibility of the reporting

forms, a new form will be developed by the permittee and submitted to Ecology for approval before being accepted in the monthly air emission report. This method will give flexibility so the reporting forms can be changed without revising the order.

2. Order number DE 01AQIS-3298 is hereby rescinded.

Order number DE 01AQIS-3298 was issued on November 2, 2001 to ensure compliance with MACT I requirements. 40 CFR Part 63 Subpart S applies and contains all of the requirements related to compliance with the MACT I for the pulping and bleaching systems. Rescinding Order number DE 01AQIS-3298 eliminates duplicative requirements. Subpart S, adopted by reference in WAC 173-400-075(6), will be used to set limitations for the Permittee's pulping and bleaching systems.

3. Condition 13 of Order number DE 99AQIS-2 is hereby deleted.

Order number DE 99AQIS-2 is a Notice of Construction Approval Order for the chlorine dioxide generator. The Order allowed construction of the generator and the associated pollution control system, to bring the mill into compliance with the cluster rule and to eliminate the use of elemental chlorine bleaching. The chlorine dioxide system became a MACT I source with parametric monitoring requirements. Order No. 1908 eliminates Condition number 13 of order DE 99AQIS-2. This Condition required the Permittee to perform EPA Method 9 opacity readings five days per week on the chlorine dioxide generator. The MACT I requirements are more restrictive than the requirements of Condition number 13. In addition, this source is very unlikely to have any opacity. Therefore, the visual opacity requirement is unnecessary

4. The following portions of order DE 98-AQI028 are hereby amended or deleted.

- The words "rolling 30 day average" in condition 21 of Order DE 98-AQI028 is hereby replaced with "monthly average."
- The sentence, "The ammonia injection feed rate shall be documented hourly..." is deleted from Condition 25.
- Condition 27 is deleted.

Order DE 98-AQI028 is a Notice of Construction Approval Order, approving K-C's construction of a new co-generating wood-fired boiler to replace five old Dutch-oven boilers; the replacement would use existing controls and pollution control equipment.

- The rolling 30 day average required by condition 21 is almost impossible to report on a monthly air emission form. The monthly average will be easier to report and is sufficient to demonstrate compliance.
- Condition 25 required hourly documentation of the ammonia injection feed rate for No. 10 boiler. Emissions from No.10 boiler do not have the ammonia trail-off expected when Order No. DE 98-AQI028 was issued. The control devices eliminate the ammonia before the air flow is emitted. Therefore, keeping track of

the ammonia feed rate is not needed. Requirements for monitoring and reporting NO_x and NH_3 emissions are retained.

- Condition number 27 of Order DE 98-AQI028 required the Permittee to take visible opacity readings five days per week, weather permitting, on Boilers 10 and 14. This Condition was placed in Order DE 98-AQI028 to monitor opacity changes caused by ammonia injection into the stack gases (for control of NO_x). Ecology's letter dated November 18, 1999, reduced the opacity readings frequency to once per week. K-C is no longer adding ammonia to the No. 14 boiler stack gasses, therefore we eliminated the opacity monitoring requirement. Ammonia is still added to the No. 10 stack gases for control of NO_x. But weekly opacity readings are no longer necessary since K-C installed Continuous Opacity Monitors (COMs) on both stacks. K-C reported no visible readings --above the opacity limit-- for either the No. 10 boiler or the No. 14 boiler, during the past permit term. EPA's Method 9 is retained as the reference test method for measuring opacity compliance.

5. Condition 10 in Order DE 02AQIS-3575 is hereby deleted.

Order DE 02AQIS-3575 was a Notice of Construction Approval Order, approving K-C's plan to rebuild paper machine No. 4. In-line natural gas burners replaced the steam heat source in re-constructing paper machine No. 4. The Order required K-C to report the operational status of the gas burners. Since the paper machine cannot operate without using the burners, Ecology knows the operational status of the burners.

RCW 70.94.141 authorizes the Department of Ecology (Department) to issue Orders to enforce the Washington Clean Air Act. Therefore the Department of Ecology hereby orders that Kimberly Clark Worldwide, Inc. shall comply with the limits and conditions specified in Table A.

Table A -- Limits and Conditions							
	Source	**Parameter**	**Limitation**	**Averaging Period**	**Sampling Frequency**	**Reporting[1] Frequency**	**Test Method**
A	Recovery System (Boiler #10)	Particulate	0.04 gr/sdcf @ 8% O_2 0.06 gr/sdcf @ 8% O_2[2]	≥ 60 minutes	Annually[3]	Annually	(EPA Method 5)[4]
A.1		Opacity	35 %	6 consecutive minutes per 60 minutes periods	Continuous	Monthly[5]	40 CFR Pt. 60, App. B, Spec. 1
A.2		Sulfur dioxide	300 ppm	One hour[6]	Continuous	Monthly	EPA Test Method 6C
A.3		TRS[7]	17.5 ppm	1 Hour Average	Annually	Annually	40 CFR Pt. 60, App. A, Method 16A/6C
B	Mill Emission	Sulfur dioxide	20 lbs/ADUT	Daily	Continuous	Monthly	Calculated[8]

[1]All monitoring results performed during the month must be reported --on a form Ecology and the Permittee mutually agreed to—by day 15 of the following month.

[2]Compliance with the MACT II standard of 0.04 gr/sdcf is compliance with WAC 173-410-040(2)(b) standard of 0.06 gr/sdcf.

[3]The testing frequency increases to quarterly, if one yearly test shows greater than 0.04 gr/sdcf, until four quarterly tests measure below 0.032 gr/sdcf (80% of theMACT II limit).

[4]The recovery furnace is a 40 CFR 63 Subpart MM source; therefore, testing must be performed by EPA Method 5, using water as the clean up liquid [40 CFR 63.865(b) (1)].

[5]Exceptions shall be reported on the monthly air reports. EPA Method 9 is the reference test method.

[6]Permittee shall average the sulfur dioxide values on an hourly basis. Permittee shall report the emission data in the monthly air emission report. The daily hourly average measurements shall start on the clock hour at 0000 hours and end at 2400 hours.

[7]Permittee shall measure TRS emissions annually, using a test method conforming to EPA 40 CFR Part 60, Appendix A, Method 16A/6C. Upon replacement of the existing sulfur dioxide-measuring CEM on this boiler, the Permittee shall measure both sulfur dioxide and total reduced sulfur --in accordance with a CEM method conforming to EPA Title 40 CFR Part 60 Appendix B Performance Specification 5-- using quality assurance procedures outlined in 40 CFR Part 60, Appendix F. Once the dual parameter CEM is installed the averaging period for TRS will be daily, the sampling frequency will be continuous, and the Permittee shall report the monitoring results to Ecology on each monthly emission report form.

[8]Permittee will use the continuous emission monitoring system sulfur dioxide data to calculate the pounds of sulfur dioxide per oven-dried ton of pulp produced.

For any visible emission from the Bleach Plant stack other than condensed water, the Permittee shall investigate and correct the problem within one (1) hour. The Permittee shall read and log any visible emission --other than condensed water—using 40 CFR Part 60, Appendix A, Method 22 during the visible episode. If any readings were logged, Permittee shall report them in the monthly report.

Nothing in this order shall be construed to relieve Kimberly Clark Worldwide, Inc. of its obligations under any applicable local, state, or federal laws or regulations.

Failure to comply with this Order may result in the issuance of civil penalties or other actions, whether administrative or judicial, to enforce the terms of this Order. The provisions of this Order are severable; if any provision of this authorization or if application of any provision of this authorization to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this authorization shall not be affected thereby.

Appeal Process

This Order may be appealed. Your appeal must be filed with the Washington Pollution Control Hearings Board (PCHB) within 30 days of receipt of this Order. The Notice of Appeal to the PCHB, shall include as an attachment, a copy of this modified Order and a copy of the original Order. At the same time, a copy of the Notice of Appeal, without attachments, must be served on the Department of Ecology. It is not necessary to send copies of the Orders to Ecology. In addition, please send a copy of the Appeal directly to the Industrial Section's Manager. The addresses are listed below.

Pollution Control Hearings Board
4224 6th Avenue SE, Rowe Six, Bldg 2
P.O. Box 40903
Olympia, Washington 98504-0903

Department of Ecology
Appeals Coordinator
P.O. Box 47608
Olympia, Washington 98504-7600

Carol Kraege, Manager
Ecology Industrial Section
P.O. Box 47706
Olympia, Washington 98504-7600

Filing your Appeal will not, itself, stay the effectiveness of this Order. You must request a Stay in writing and submit it in accordance with RCW 43.21B.320.

The Department of Ecology issues this Order consistent with the authorities conferred by the provisions of Chapter 43.21B RCW.

DATED this 31st day of August, 2005 at Olympia, Washington

_____

Carol Kraege, P.E.
Industrial Section Manager

(1)

STATE OF WASHINGTON
Dixy Lee Ray
Governor

DEPARTMENT OF ECOLOGY
Olympia, Washington 98504 206/753-2800
Mail Stop PV-11

JUN 29 1979

CERTIFIED MAIL

Mr. A. M. Miller
Manager of Environmental Resources
Scott Paper Company
Box 925
Everett, Washington 98206

Dear Mr. Miller:

Enclosed is Order, Docket No. DE 79-335. All correspondence relating to this docket should be directed to the enforcement officer. If you have any questions concerning the content of the docket, please call Bruce Johnson, Olympia, telephone 753-3881.

A form entitled "Acknowledgment of Service" is also enclosed. Please sign the original of this form and return it to this office.

This order is issued under the provisions of RCW 70.94.332. Any person feeling aggrieved by this order may obtain review thereof by application, within thirty (30) days of receipt of this order, to the Washington Pollution Control Hearings Board, Olympia, Washington 98504, with a copy to the Director, Department of Ecology, Olympia, Washington 98504, pursuant to the provisions of Chapter 43.21B RCW and the rules and regulations adopted thereunder.

Very truly yours,

Gail Pruitt

Gail Pruitt
Assistant Enforcement Officer

GP:vb

Enclosures

cc: Jack Coulter
John Walkush
F. C. Milotich

DEPARTMENT OF ECOLOGY

IN THE MATTER OF APPROVING CONSTRUCTION OF AN AIR CONTAMINANT SOURCE AT THE SCOTT PAPER COMPANY SULFITE PULPING MILL IN EVERETT, WASHINGTON	)))))	ORDER Docket No. DE 79-335

To: Mr. A. M. Miller
Manager of Environmental Resources
Scott Paper Company
Box 925
Everett, Washington 98206

A Notice of Construction dated March 30, 1979 was filed relating to the installation of air pollution control facilities for a new paper machine at the Scott Paper Company pulp mill in Everett, Washington. Public notice of a preliminary determination regarding the Notice of Construction was published in the Everett Herald on May 7, 1979.

In relation to the above, the Department of Ecology, State of Washington, pursuant to RCW 70.94.152 and WAC 173-410-081, makes the following determinations:

(a) The proposed project, if constructed and operated as herein required, will be in accordance with applicable rules and regulations, as set forth in Chapter 173-400 WAC, and the operation thereof, at the location proposed, will not result in ambient air quality standards being exceeded as set forth in WAC 18-32, 18-40, 18-46, and 18-56.

(b) The proposed project, if constructed and operated as herein required, will provide all known, available and reasonable methods of emission control.

THEREFORE, IT IS ORDERED that the project as described in said Notice of Construction and more specifically detailed in plans, specifications and other information submitted to the Department of Ecology in reference thereto, is approved for construction, installation and operation, provided the following condition is met:

Emissions from air pollution control facilities for the new paper machine shall not exceed a mass flow rate of 50 pounds of particulate and 100 pounds of hydrocarbons per day.

DATED at Olympia, Washington, this 29th day of June 1979.

Donald O. Provost
Assistant Director
Department of Ecology
State of Washington

IN THE MATTER OF APPROVING CONSTRUCTION	)	
OF A NEW AIR CONTAMINANT SOURCE AT	)	ORDER
KIMBERLY-CLARK TISSUE COMPANY	)	No. DE 98-AQI028
EVERETT, WASHINGTON	)	

To: Kimberly-Clark Tissue Company (formerly Scott Paper Company)
2600 Federal Avenue
Everett, WA 98206

On January 18, 1993, Scott Paper Company, in conjunction with Snohomish County PUD No. 1, submitted a Notice of Construction application to replace five hog fuel boilers with one woodwaste boiler that will cogenerate electricity. The facility used to operate nine boilers; the five that were replaced were Dutch Oven hog fuel boilers that were constructed in 1929. The new woodwaste boiler (No. 14 Boiler) will increase steam production from 200,000 to 435,000 lbs. of steam per hour and can produce 325,000 megawatt-hours of electrical power. Proposed emission controls include combustion optimization, urea or ammonia injection for NOx control, and bag house filtration.

Additional information was conveyed to the department by letter and conversation between the period of the initial notice of construction (NOC) submittal and the date the department determined the application to be complete.

On May 20, 1993, the department issued a preliminary determination regarding its intent to approve construction, subject to specific emission limits. Public notice of the preliminary determination was made on May 22, 1993. NOC approval order DE93-AQI064 was issued July 1, 1993.

Construction was completed August 1995 with start-up operations beginning thereafter. Commercial operation began in August 1996.

The control technology chosen to control Nitrogen Oxides (NO_X) created a visible plume when the system was fully deployed. The First Amendment to DE93-AQI064, dated September 1996, addressed that concern by restricting plume generation while studying NO_X reduction levels. The goal of that Order was elimination of the visible plume while keeping all other regulated emissions at a minimum. That goal has been met.

The No. 10 boiler historically emitted 1,223 tons per year of NO_X. The Second Amended Order, dated March 4, 1997, required reductions in this emission rate to offset NO_X increases from No. 14 boiler beyond the originally permitted limit of 217 tons per year. The Second Amended Order limited the combined NO_x emissions from No. 10 and No. 14 boilers to a total of 1,400 tons per year, a net reduction of 40 tons/year for these sources taken together. Due to this source-wide enforceable NO_X emission reduction, PSD permitting for this project is not applicable.

During the first full year since the issuance of the Second Amended Order (April 1997 - March 1998) No. 14 boiler emitted 368.3 tons of NO_x, and No. 10 boiler emitted 186.2 tons, for a site total of 554.5. This compares to the previous condition of 217 tons (permitted) from No. 14 boiler plus 1,223 tons (actual) from #10 boiler, a total of 1,440 tons. This is a 61% reduction in emissions from the site.

A study determined that the boiler's average NO_x emission reduction during appropriate deployment (without generating a plume) of the ammonia injection system is below 20%. Recent listings in EPA's BACT/LEAR clearinghouse for similar wood waste boilers, show NO_x emissions are permitted from 0.23 to 0.54 #MM/BTU. None of these emission units employ ammonia injection for NO_x reduction. The final NO_x limitation for the No. 14 Kimberly-Clark boiler of 180 lbs/hr, is approximately equivalent to 0.22 #MM/BTU. The boiler design and combustion controls allow it to run at or below this emission rate without ammonia injection.

Therefore, for the No. 14 Kimberly-Clark boiler, it is determined that BACT for NO_x is accomplished by boiler design and combustion controls, and does not include the addition of ammonia.

This Order completes the final conditions of approval (which began as Order No. DE 93-AQI064) for construction and operation of the No. 14 wood waste boiler.

Preserved Original Conditions

In relation to the above, the Department of Ecology, State of Washington, pursuant to RCW 70.94.153 and WAC 173-400-110, makes the following determinations regarding the project, if it is constructed and operated as herein required:

1. The proposed project will meet all applicable federal and state rules and regulations including: General Regulations for Air Pollution Sources, Chapter 173-400 WAC; New Source Performance Standards (NSPS), 40 CFR Part 60; and National Emissions Standards for Hazardous Air Pollutants (NESHAPS), 40 CFR Part 61.

2. Best available control technology (BACT) will be used for emission control.

3. The proposed project will not have a significant adverse impact on the environment.

4. The proposed new emission unit within a modified source will not cause a violation of any ambient air quality standard.

THEREFORE, IT IS OREDERED THAT the project, as described in said Notice of Construction and more specifically detailed in plans, specifications and other information submitted to the Department of Ecology in reference thereto, is approved for construction, installation and operation, subject to the following emissions limitations and other conditions.

1. A plan for specifying, measuring and limiting non-wood fuel and solid waste to ensure that combustion of such materials does not exceed 12 tons per day shall be submitted for Ecology approval within one year of the final NOC approval. Before processed wood waste streams, solid waste, or other non-wood material are used in the new boiler, the permittee will provide to Ecology revised ambient air modeling data, that will include an analysis of lead and toxic air contaminant (TAC) metals (with updated loadings corresponding to the proposed material). The ongoing use of processed wood waste, solid waste, or other non-wood material in No. 14 boiler may require periodic source testing for lead and TAC metals. This condition has been completed.

2. Carbon monoxide emissions from the No. 14 boiler shall not exceed 763 parts per million on a dry volume basis (ppmv) corrected to seven percent oxygen on a 30 day rolling average and shall not exceed 359 pounds per hour on an annual average. After one year of boiler operation CO emissions from the No. 14 boiler shall not exceed 511 ppmv corrected to seven percent oxygen on a 365 day rolling average. Compliance, initially, shall be determined by Reference Method 10 or 10A of 40 CFR, Part 60, Appendix A dated July 1, 1992. Compliance shall also be determined by continuous emission monitoring system (CEMS) that meets the requirements of section 16 of this order. The initial operational year has expired and the 511 ppmv limit is in effect.

3. Opacity from the No. 14 Boiler shall not exceed 10 percent averaged over six consecutive minutes as measured by a continuous monitoring system, which meets the requirements of section 16 of this order.

4. Within 180 days of startup of the No. 14 Boiler, Boilers 1 through 5 shall be permanently shutdown. No. 6 boiler will operated only after Ecology approval. Boilers 1 through 6 have been demolished.

5. Particulate emissions from the No. 14 boiler shall not exceed 0.011 grains per dry standard cubic foot (gr/dscf) corrected to seven percent oxygen and shall not exceed 17.4 pounds per hour. Compliance shall be

determined by Reference Method 5 of 40 CFR, Part 60, Appendix A dated July 1, 1992. Compliance shall be determined by the arithmetic mean of three one-hour sampling periods. Source tests will be performed quarterly for the first 12 months of operation and yearly thereafter with compliance established.

6. Particulate matter less than 10 micrometers (PM10) emissions from the No. 14 boiler shall not exceed 0.0084 grains per dry standard cubic foot (gr/dscf) corrected to seven percent oxygen and shall not exceed 11.6 pounds per hour. Compliance shall be determined by Reference Method 5 of 40 CFR, Part 60, Appendix A dated July 1, 1992 under the assumption all of the emitted particulate is PM10. Alternatively, compliance may be determined by EPA Method 201 or 201A of CFR Part 51, Appendix M as of July 1, 1992 or an equivalent method approved by Ecology. Compliance shall be determined by the arithmetic mean of three one-hour sampling periods. Source tests will be performed quarterly for the first 12 months of operation and yearly thereafter with compliance established.

7. Backup fuel oil shall be limited to No. 2 distillate with a sulfur content not to exceed 0.05 percent by weight. Kimberly-Clark shall maintain fuel receipts from the fuel supplier that certify that the fuel oil meets the fuel oil sulfur limit.

8. Volatile organic compounds (VOC) emissions from the No. 14 boiler shall not exceed 34.5 pounds per hour. Compliance shall be determined by Reference Method 25A or Method 18 of 40 CFR Part 60, Appendix A dated July 1, 1992. Source tests will be performed quarterly for the first 12 months of operation and yearly thereafter with compliance established. VOC testing is now required yearly.

9. Within 60 days after achieving maximum production, but not later than 180 days after startup, Kimberly-Clark shall conduct performance tests for NOx, SO2, CO, VOC, PM10, lead and TAC metals, opacity, and ammonia from the No. 14 Boiler to be conducted by an independent testing firm. A test plan shall be submitted for Ecology approval at least 30 days before testing. Kimberly-Clark shall notify Ecology at least 7 days before testing. This condition has been met.

10. Operation of the equipment must be conducted in compliance with all data and specifications submitted as part of the notice of construction application unless otherwise approved by the department.

11. Any activity, which is undertaken by Kimberly-Clark or others, in a manner, which is inconsistent with the application and this order, shall be subject to Department enforcement under applicable regulation. Nothing in this order shall be construed so as to relieve Kimberly-Clark of its obligations under any state, local or federal laws or regulations.

12. Kimberly-Clark shall notify the Department in writing within thirty days of startup of the No. 14 Boiler. This condition has been met.

13. One hundred and eighty days after startup of the No. 14 Boiler, Boilers No. 7, 8 and 9 shall cumulatively burn no more than 80,000,000 cubic feet of natural gas per month based on a twelve month rolling average and shall not burn more than 413,300,000 cubic feet per month based on a one month average.

    One hundred and eighty days after startup of the No. 14 Boiler, Boilers No. 7, 8 and 9 shall cumulatively burn no more than 39,100 gallons of fuel oil per month based on a twelve month rolling average and shall not burn more than 469,000 gallons per month on an one month average.

14. One hundred and eighty days after startup of the No. 14 Boiler, Boiler No. 10 shall burn no more than 7,928,000 gallons of spent sulfite liquor per month on a monthly average.

15. This approval shall become void if construction of the No. 14 Boiler is not commenced within eighteen (18) months after receipt of this approval, or if construction of the project is discontinued for a period of eighteen (18) months.

16. Any continuous emissions monitoring system (CEMS) used by Kimberly-Clark to measure NOx, CO, opacity, SO_2, or oxygen emissions shall, at a minimum, conform with EPA Title 40 CFR, Part 60, Appendix B Performance Specifications as of July 1, 1992.

17. CEMS and process data shall be reported in written form to Ecology at least monthly (unless a different testing and reporting schedule has been approved by Ecology) within thirty days of the end of each calendar month and in a format approved by Ecology that shall include at least the following:

    17.1 Process or control equipment operated parameters.
    17.2 The daily maximum and average concentration in the units of the standard for each pollutant monitored.
    17.3 The duration and nature of any monitor downtime.
    17.4 Results of any monitor audits or accuracy checks.
    17.5 Results of any stack tests.
    17.6 Signature of responsible person.

18. For each occurrence of monitored emissions above the standard the report shall include the following:

    18.1 The time of occurrence.
    18.2 Magnitude of the emission of process parameters excess.
    18.3 The duration of the excess.
    18.4 The probable cause.
    18.5 Corrective actions taken or planned.
    18.6 Any other agency contacted.
    18.7 Signature of responsible person.

19. Operating and maintenance manuals for all equipment that has the potential to affect emissions to the atmosphere shall be developed and followed. Copies of the manuals shall be available to Ecology. Emissions that result from a failure to follow the requirements of the manuals may be considered proof that the equipment was not properly operated and maintained.

20. Sampling ports and platforms shall be provided for the No. 14 Boiler after the final pollution control device. The ports shall meet the requirements of 40 CFR, Part 60, Appendix A Method 1. Adequate permanent and safe access to the test ports shall be provided. Other arrangements may be acceptable if approved by Ecology prior to installation.

Final Determination of Certain Emission Limits

21. The 30 day rolling average nitrogen oxides (NOx) emissions from the No. 14 boiler shall not exceed 150 parts per million on a dry volume basis (ppmv) corrected to seven percent oxygen, and shall not exceed 180 pounds per hour. No. 14 boiler's daily average and rolling 30 day average lbs/hr NO_x emission, total emitted tons per day, and tons per month shall be reported monthly. Compliance shall be determined by a continuous emission monitoring system (CEMS) that meets the requirements of section 16 of this order.

22. The cumulative overall NO_x emission from the No. 14 wood waste boiler and the No. 10 recovery boiler shall not exceed 1,400 tons per year on a 12 month rolling average basis beginning August 1, 1996. No. 10

boiler's daily average NO_X emission, in units of pounds per hour; shall be reported monthly.. The yearly rolling total NO_X tonnage for No. 10 and No. 14 boilers, with a start date of August 1, 1996, shall be reported monthly. Compliance shall be determined by a continuous emission monitoring system (CEMS) that meets the requirements of section 16 of this order.

23. Opacity from the No. 14 Boiler shall not exceed 10 percent as measured by EPA reference Method 9.

24. Opacity from the No. 10 Boiler shall not exceed 35 percent as measured by EPA reference Method 9.

25. Ammonia emissions from No. 10 boiler stack shall not exceed 10 ppm corrected to 7 percent oxygen. Compliance with ammonia limits shall be determined by EPA Reference Method 5 of 40 CFR Part 60, Appendix A as of July 1, 1992 with modifications to the impinger or an equivalent method approved by the Department of Ecology to be performed quarterly. Ammonia testing may be reduced, after one year of conitinuos compliance has been established, with approval from Ecology. The ammonia injection feed rate shall be documented hourly. The daily average, the daily maximum ammonia feed rate, and the total daily injection duration shall be reported monthly to Ecology.

26. Sulfur dioxide (SO_2) emissions from the No. 14 boiler shall not exceed 79.2 pounds per hour (equivalent to 347 tons/year) on a twelve-month rolling average basis. The twelve-month rolling average shall be calculated and reported monthly based on the CEMS data for the preceding 12 months. Compliance shall be determined by a continuous monitoring system (CEMS) that meets the requirements of section 16 of this order . The CEMS shall be operational by August 1, 1997.

27. Kimberly-Clark or its representative shall read, log, and report opacity from the No. 14 and No. 10 Boilers using 40 CFR Pt. 60, App. A, Method 9, 5 days a week, weather permitting, and when Kimberly-Clark receives notice that visible emissions may exist. When a certified Method 9 reader is unavailable, 40 CFR Pt. 60, App. A, Method 22 shall be used. Kimberly-Clark shall employ, at the Everett site, a certified Method 9 opacity reader continuously. When 180 calendar days of continuous compliance with opacity requirements are demonstrated by Kimberly-Clark, Method 9 observations may be reduced with Ecology's approval.

All plans, specifications and other information submitted to the Department of Ecology relative to this project and further documents and any further authorizations or approvals or denials in relation thereto shall be kept at the Industrial Section Office of the Department of Ecology in the "Air Correspondence" files and by such action shall be incorporated herein and made a part hereof.

Nothing in this approval shall be construed as obviating compliance with any requirement of law other than those imposed pursuant to the Washington Clean Air Act and rules and regulations thereunder.

Authorization may be modified, suspended or revoked in whole or part for any cause including, but not limited to, the following:

1. Violation of any terms or conditions of this authorization;
2. Obtaining this authorization by misrepresentation of failure to disclose fully all relevant facts.

The provisions of this authorization are severable and, of any provision of this authorization, or application of any provisions of this authorization to any circumstance, is held invalid, the application of such provision to their circumstances and the remainder of this authorizations, shall not be affected thereby.

Enforcement

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

P.O. Box 47600 • Olympia, Washington 98504-7600
(360) 407-6000 • TDD Only (Hearing Impaired) (360) 407-6006

February 20, 2004

CERTIFIED MAIL
7099 3220 0008 8266 8714

Scott T. Helker
Kimberly-Clark Worldwide, Inc.
2600 Federal Avenue
Everett, WA 98201

Dear Mr. Helker,

Enclosed is Notice of Construction No. DE 04AQIS-5956. If you have any questions concerning the content of the document, please call or write Don Nelson, at telephone/address (360) 407-6940, Department of Ecology, PO Box 47600, Olympia, WA 98504-7600.

Sincerely,

Carol Kraege

Carol Kraege
Manager, Industrial Section

Enclosure

DEPARTMENT OF ECOLOGY

NOTICE OF CONSTRUCTION APPROVAL ORDER FOR KIMBERLY-CLARK WORLDWIDE, INC.	)))	ORDER No. DE 04AQIS-5956

To: Scott T. Helker
Mill Manager
Kimberly-Clark Worldwide, Inc.
2600 Federal Avenue
Everett, WA 98201

This is a Notice of Construction Approval Order issued in accordance with RCW 70.94.152, WAC 173-400-110 and WAC 173-460-040. A Notice of Construction Application (NOC) was received on January 8, 2004 from Kimberly-Clark Worldwide, Inc. (KCWW) and was determined to be complete on January 12, 2004.

The proposed project is for a change of fuel, that is, the company will be able to burn creosoted treated wood without being regulated by WAC 173-434. WAC 173-434 was revised on December 22, 2003 to allow the burning of creosoted wood in boiler number 14 without becoming an incinerator if an NOC was issued after December 1, 2003 and if the creosoted wood had not been in or frequently splashed with brackish or salt water.

Ecology received an NOC application package for the creosoted wood burning project and is the lead agency since no other permits are required. Ecology determined that the project has very little impact on the environment and issued a Determination of Nonsignificance with public notice because of previous public interest. No comments were received; therefore, the NOC is being issued without changes.

Based on the complete NOC application and a technical analysis, Ecology makes the following determinations regarding the project as required in this order:

1. The project will meet all applicable federal and state rules and regulations including: General Regulations for Air Pollution Sources, Chapter 173-400 WAC, *New Source Performance Standards (NSPS), 40 CFR Part 60, and Toxic Best Available Control Technology (T-BACT) as required under WAC 173-460.*

2. The emissions from the modified source will not cause or contribute to a violation of any ambient air quality standard.

The Notice of Construction is hereby approved for burning up to 500 tons/day of creosoted treated wood in Number 14 boiler. KCWW is also allowed to burn controlled substances from law enforcement agencies, oil contaminated paper generated on site, and

Appeal Process

This Order may be appealed. Your appeal must be filed with the Washington Pollution Control Hearings Board (PCHB) within 30 days of receipt of this Order. The notice of appeal, to the PCHB, shall include, as attachments, a copy of this NOC Approval order, a copy of the NOC application, and any additional information submitted to Ecology in support of the application. At the same time, a copy of the notice of appeal, without attachments, must be sent to the Department of Ecology. The addresses are listed below.

The Pollution Control Hearings Board
P.O. Box 40903
Olympia, Washington 98504-0903

Carol Kraege
Ecology
Industrial Section Manager
P.O. Box 47706
Olympia, Washington 98504-7600

Your appeal alone will not stay the effectiveness of this Order. Stay requests must be submitted in accordance with RCW 43.21B.320. These procedures are consistent with the provisions of Chapter 43.21B RCW.

DATED this 20 day of February, 2004 at Olympia, Washington

Carol Kraege

Carol Kraege, P.E.
Industrial Section Manager

IN THE MATTER OF APPROVING CONSTRUCTION OF A NEW AIR CONTAMINANT SOURCE AND A MODIFICATION OF AN EXISTING SOURCE AT KIMBERLY-CLARK CORPORATION EVERETT, WASHINGTON	)	ORDER No. DE 99AQIS-2

To: Kimberly-Clark Corporation
2600 Federal Ave.
Everett, WA 98201

On September 28, 1999, Kimberly-Clark Corporation completed its Notice of Construction application to construct a chlorine dioxide generator and an overall bleach system modification. Additional information was conveyed to the department by letter and conversation. The system will process approximately 168,000 Air Dry Metric Tons of Pulp per year.

Pulping begins with digestion of wood chips to fiber (pulp) and lignin. After digestion pulp moves to the bleach plant. There, at the bleach plant, will be an installation of new complete hooding (with sealed venting to emission controls) for each bleaching stage, and the entire system will be converted to an elemental chlorine free process. The substitute bleaching agent, chlorine dioxide, will be manufactured onsite.

Air emissions from the source will be treated with wet scrubbers and will exit a 18 inch diameter stack at approximately 6,000 cubic feet per minute. Maximum predicted total chlorinated hazardous air pollutants (HAPs) are expected to be 0.32 tons per year. Some hazardous air pollutants including chlorine and chloroform are expected to decrease from existing emission rates due to increased emission controls and changes in production.

A determination of mitigated nonsignificance for the project was made by the City of Everett on June 16, 1999, in conformance with the State Environmental Policy Act.

In relation to the above, the Department of Ecology, State of Washington, pursuant to RCW 70.94.153 and WAC 173-400-110 and 460, makes the following determinations regarding the project, if it is constructed and operated as herein required:

1. The proposed project is subject to, and must meet all applicable federal and state rules and regulations including: General Regulations for Air Pollution Sources, Chapter 173-400&460 WAC; New Source Performance Standards (NSPS), 40 CFR Part 60; National Emissions Standards for Hazardous Air Pollutants (NESHAPS), 40 CFR Part 61; and National Emissions Standards for Hazardous Air Pollutants for Source Categories, 40 CFR Part 63.

2. Best available control technology (BACT) shall be used for emission control.

3. The proposed project shall not have a significant adverse impact on the environment.

4. The proposed new emission unit shall not cause a violation of any ambient air quality standard.

THEREFORE, IT IS ORDERED THAT the project, as described in said Notice of Construction and more specifically detailed in plans, specifications and other information submitted to the Department of Ecology in reference thereto, is approved for construction, installation and operation, subject to the following emissions limitations and other conditions.

5. Kimberly-Clark shall notify the Department in writing within thirty days of startup of the chlorine dioxide generator or the bleach system modification.

6. Operation of the equipment must be conducted in compliance with all data and specifications submitted as part of the notice of construction application unless otherwise approved by the department.

Correspondence

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
P.O. Box 47600 • Olympia, Washington 98504-7600
(360) 407-6000 • TDD Only (Hearing Impaired) (360) 407-6006

July 9, 2004

CERTIFIED MAIL
7099 3220 0008 8266 8479

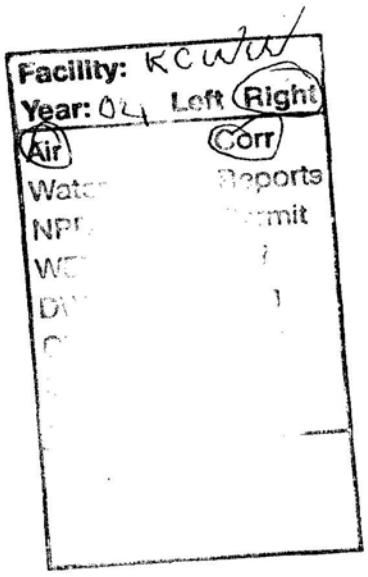
Scott T. Helker
Kimberly-Clark Worldwide, Inc.
2600 Federal Avenue
Everett, WA 98201

Dear Mr. Helker,

Enclosed is Notice of Construction No. 1522 – AQ04. If you have any questions concerning the content of the document, please call or write Don Nelson, at telephone/address (360) 407-6940, Department of Ecology, PO Box 47600, Olympia, WA 98504-7600.

Sincerely,

Carol Kraege
Manager, Industrial Section



Enclosure

to the dry end of the machine. This will allow the natural gas burners to operate at 3.0 MMBTU. However, they will be built to provide 12.5 MMBTU in cases where fresh air has to be heated from ambient conditions. This method of design operation is expected to be a minor portion of the time

The burners represent Best Available Control Technology (BACT). For NOx, BACT is a state-of-the-art gas burner. For carbon monoxide (CO), the volume of exhaust gas and its temperature are not amenable to CO control methods such as catalytic reduction. CO emissions are a dependent variable related to the degree of NOx emission reduction achieved. Thus properly tuned state-of-the-art burners are proposed as BACT for CO control for this project. The gas burners are guaranteed to produce no more than 0.048 pounds/MMBTU of NOx. For CO, the burners are guaranteed at 0.073 pounds/MMBTU. Modeling has demonstrated that all emissions of Toxic Air Pollutants will be below the appropriate ASIL.

Primary components of the Number 3 Paper Machine Project include:

1. Replacement of steam dryers
2. Installation of new natural gas burners

Table 1: Potential Emission Increase (Pollutants (tons/year))

Emission Unit	PM=PM10	VOC	NOx	CO	SO2
Natural Gas Burner	0.5	0.6	5.3	8.1	0.1
Significance Threshold	15	40	40	100	40

In relation to the above, the Department of Ecology, State of Washington, pursuant to RCW 70.94, WAC 173-400, and WAC 173-460 makes the following determinations regarding the project, if it is constructed and operated as herein required:

1. The proposed project will meet all applicable federal and state rules and regulations including: General Regulations for Air Pollution Sources, Chapter 173-400 WAC and TAPS Chapter 173-460 WAC.

2. Best available control technology (BACT) will be used for emission control.

3. The proposed project will not have a significant adverse impact on the environment.

4. The proposed new emissions from a modified source will not cause a violation of any ambient air quality standard.

Nothing in this order shall be construed to relieve KCWW of its obligations under any applicable state, local, or federal laws or regulations.

1. This order may be modified, suspended or revoked in whole or part for cause including, but not limited to, the following:
2. Violation of any terms and conditions of this order.
3. Misrepresentation or failure to disclose fully all relevant facts in the Notice of Construction Application.

This Order shall become invalid if construction is not commenced within 18 months after receipt of final approval, if construction is discontinued for a period of 12 months or more.

The provisions of this order are severable and, if any provision of this authorization, or application of any provision of this authorization to any circumstances, is held invalid, the application of such provision to their circumstances and the remainder of this authorization shall not be affected thereby.

Appeal Process

This Order may be appealed. Your appeal must be filed with the Washington Pollution Control Hearings Board (PCHB) within 30 days of receipt of this Order.

The notice of appeal, to the PCHB, shall include, as attachments, a copy of this NOC Approval order, a copy of the NOC application, and any additional information submitted to Ecology in support of the application. At the same time, a copy of the notice of appeal, without attachments, must be sent to the Department of Ecology. The addresses are listed below.

The Pollution Control Hearings Board
P.O. Box 40903
Olympia, Washington 98504-0903

Carol Kraege
Ecology
Industrial Section Manager
P.O. Box 47706
Olympia, Washington 98504-7600

Your appeal alone will not stay the effectiveness of this Order. Stay requests must be submitted in accordance with RCW 43.21B.320. These procedures are consistent with the provisions of Chapter 43.21B RCW.

DATED this 9th day of July, 2004 at Olympia, Washington

Carol Kraege

Carol Kraege, P.E.
Industrial Section Manager

3. The proposed project will not have a significant adverse impact on the environment.

4. The proposed new emissions from a modified source will not cause a violation of any ambient air quality standard.

THEREFORE, IT IS OREDERED THAT the project, as described in said Notice of Construction permit application, and other information submitted to the Department of Ecology in reference thereto, is approved for construction, installation and operation, subject to the following emissions limitations and other conditions listed below.

1. Within 60 days after achieving maximum production, but not later than 180 days after startup, the Kimberly-Clark Corporation shall conduct performance tests for NOx, SO_2, CO, VOC, PM_{10}, and opacity from the natural gas burners to be conducted by an independent testing firm. A test plan shall be submitted for Ecology approval at least 30 days before testing. The Kimberly-Clark Corporation shall notify Ecology at least 7 days before testing. Ecology will evaluate this testing data for the need for any limits to be placed upon the equipment.

2. Operation of the equipment must be conducted in compliance with specifications submitted as part of the notice of construction application unless otherwise approved by the Department of Ecology.

3. Any activity, which is undertaken by the Kimberly-Clark Corporation or others, in a manner, which is inconsistent with the application and this order, shall be subject to Department of Ecology enforcement under applicable regulation. Nothing in this order shall be construed so as to relieve the Kimberly-Clark Corporation of its obligations under any state, local or federal laws or regulations.

4. Kimberly-Clark Corporation shall notify the Department in writing within thirty days of startup.

5. This approval shall become void if construction is not commenced within eighteen (18) months after receipt of this approval, or if construction of the project is discontinued for a period of eighteen (18) months.

6. Any continuous emissions monitoring system (CEMS) used by the Kimberly-Clark Corporation to measure NOx, CO, opacity, SO_2, or oxygen emissions shall, at a minimum, conform with EPA Title 40 CFR, Part 60, Appendix B Performance Specifications as of July 1, 1992.

7. Monitoring systems performance reports for continuous monitoring devices shall be submitted in written form to Ecology at least semiannually. All reports shall be postmarked by the 30th day following the end of each six-month period. Written reports of excess emissions shall satisfy the requirements of 40 CFR 60.7 (c). Excess emission and process

data shall be reported in written form to Ecology at least monthly (unless a different testing and reporting schedule has been approved by Ecology) in compliance with reporting requirements required in Air Operating permit number WAAOP-000062-1.

8. At all times, including periods of abnormal operation and upset, Kimberly-Clark shall, to the extent practicable, maintain the facility, and operate and maintain process units and air pollution control equipment in a manner consistent with good air pollution control practice. Operation and Maintenance (O&M) manuals shall be prepared and reviewed annually for all equipment units. Copies of the manuals shall be available to Ecology. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to Ecology which may include, but is not limited to, monitoring results, opacity observations, inspections of the source, and reviews to determine that the plant is following its O & M procedures.

9. Sampling ports and platforms shall be provided. The ports shall meet the requirements of 40 CFR, Part 60, Appendix a Method 1. Adequate permanent and safe access to the test ports shall be provided. Other arrangements may be acceptable if approved by Ecology prior to installation.

10. Kimberly-Clark will note on monthly air emission reports to Ecology if the burners were in use. The BACT requirement will be considered met when the burners are in use.

This Order may be appealed. Your appeal must be filed with the Pollution Control Hearings Board, P.O. Box 40903, Olympia, Washington 98504-0903 within thirty (30) days of your receipt of this Order. At the same time, your appeal must also be sent to the Department of Ecology c/o the Industrial Section, P.O. Box 47600, Olympia, Washington 98504-7600. Your appeal alone will not stay the effectiveness of this Order. Stay requests must be submitted in accordance with RCW 43.21B.320. These procedures are consistent with C.43.21B RCW.

Dated this 21st day of March, 2002 at Lacey, Washington.

Reviewed by: _____
Marc E. Crooks, P.E.
Industrial Section

Approved by: _____
Carol Kraege, P.E.
Industrial Section Supervisor

Appendix C: Definitions of Abbreviations Used In Permit

ADMT	air dry metric ton
adut	air dried unbleached ton
BACT	Best available control technology
BART	Best available reasonable technology
BDMT	bone dry metric ton
BL	black liquor
BLS	black liquor solids
Btu	British thermal unit, is the amount of heat necessary to increase the temperature of one pound of water at 39.1°F one Fahrenheit degree
CEM	continuous emission monitor
CO	carbon monoxide
DOE	Department of Ecology
dscf	dry standard cubic foot
EPA	Environmental Protection Agency
ESP	electrostatic precipitator
FCAA	Federal Clean Air Act
gpm	gallons per minute
gr	grain
HAP	hazardous air pollutant
IEU	insignificant emission unit
kg	kilogram
lbs	pounds
MACT	maximum available control technology
MMBTU	million British thermal units
NOx	oxides of nitrogen
NSPS	new source performance standards
PM	particulate matter
PM-10	particulate matter less than 10 microns in diameter
ppm	parts per million
ppmdv	part per million dry volume
RACT	Reasonable available control technology
SERP	source emission reduction plan
SIP	state implementation plan
SO2	sulfur dioxide
SSL	spent sulfite liquor
tpy	tons per year
TRS	total reduced sulfur
TSP	total suspended particulate
U.S.C.	United States Code
VOC	volatile organic compound
WAC	Washington Administrative Code

Appendix D: Algorithms For Emissions Calculation

The Permittee may use an equivalent alternative method with written approval by Ecology

NOx

NO_x (mass/time) = Concentration*Air Flow Rate*Unit Conversion Factor*Time Adjustment

Concentration is case specific in terms of averaging period. Each emission unit limitation specifies the averaging period used by the CEM. For example, the CEM value on #14 Boiler is averaged over 1 hour to determine compliance.
Air Flow Rate Air flow determined by Method 2 resulting from source testing during normal operation.
Unit Conversion Factor is pollutant specific and involves molar mass and molar volume.
Time Adjustment is case specific and is dependent on the flow rate time unit. For example, the pounds per hour NO_x rate is calculated using CEM data from the 24 hour day and measured flow. That average is placed into the previous 29 days of data to derive the current 30 day average that is required by the permit.

CO

CO (mass/time) = Concentration*Air Flow Rate*Unit Conversion Factor*Time Adjustment

Concentration is case specific in terms of averaging period. Each emission unit limitation specifies the averaging period used by the CEM. For example, the CEM on #14 Boiler derives an averaged over 1 hour.
Air Flow Rate Air flow determined by Method 2 resulting from source testing during normal operation.
Unit Conversion Factor is pollutant specific and involves molar mass and molar volume.
Time Adjustment is case specific and is dependent on the flow rate time unit. For example, a daily value for CO in pound per hour are calculated using CEM data from the 24 hour day and measured flow. That average is placed into the previous 364 days of data to derive the current 365 day average required by the permit.

SO_2

SO_2 (mass/time) = Concentration * Air Flow Rate * Unit Conversion Factor * Time Adjustment
SO_2 (mass/ton of Pulp) = SO_2 (mass/time)/Pulp production(ton/time)

Concentration is case specific in terms of averaging period. Each emission unit limitation specifies the averaging period used by the CEM. For example, the CEM on #14 Boiler derives a value averaged over 1 hour.
Air Flow Rate must be representative of normal operation. Air flow derived from correlation between firing rate and Method 2 determined air flow resulting from source testing.
Unit Conversion Factor is pollutant specific and involves molar mass and molar volume. For example, the unit conversion factor for SO2 is 64 lb/mole * 1 mole/385 cubic feet.
Time Adjustment is case specific and is dependent on the flow rate time unit. For example, a daily pounds per hour SO2 rate is calculated using CEM data from the 24 hour day and measured flow rates. That average is placed into the current months data to derive the current monthly

average, this 1month average is then placed into the previous 11 months to derive the rolling 12 month average as required by the permit.

VOC

VOC (mass per time) = Concentration * Air Flow Rate * Unit Conversion Factor * Time Adjustment

Concentration is case specific in terms of averaging period. Each emission unit limitation specifies the averaging period.
Air Flow Rate must be representative of normal operation and is derived from the RM 5 test.
Unit Conversion Factor is pollutant specific and involves molar mass and molar volume.
Time Adjustment is case specific and is dependent on the flow rate time unit.

PM

PM (mass per time) = Concentration*Air Flow Rate*Unit Conversion Factor*Time Adjustment

Concentration is Reference Method (RM) dependent. For example, RM 5 gives PM in terms of
gr/dscf.
Air Flow Rate must be representative of normal operations and is derived from the RM 5 test.
Unit Conversion Factor is case specific. For example 7,000 grains = 1 lb.
Time Adjustment is case specific and is dependent on the flow rate time unit.